



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

MAR 23 2015

CERTIFIED MAIL 70010320 0004 6184 8533
RETURN RECEIPT REQUESTED

Mr. Mark Gomez
Environmental Health & Safety Coordinator
Roush
11916 Market Street
Livonia, Michigan 48150

Re: Notice of Violation
Compliance Evaluation Inspection
EPA ID No. MID094555299

Dear Mr. Gomez:

On August 29 and 31, 2012, a representative of the U.S. Environmental Protection Agency inspected the Roush facility located in Livonia, Michigan. At the time of the inspection, Roush was a large quantity generator of hazardous waste, and Roush is subject to the Resource Conservation and Recovery Act, 42 U.S.C. § 6901 *et seq.* (RCRA). The purpose of the inspection was to evaluate Roush's compliance with certain provisions of RCRA and its implementing regulations related to the generation, treatment and storage of hazardous waste. A copy of the inspection report is enclosed for your reference.

Based on information provided by Roush, EPA's review of records pertaining to Roush, and the inspector's observations, EPA has determined that Roush has unlawfully stored hazardous waste without a license or interim status as a result of Roush's failure to comply with certain conditions for a license exemption under Mich. Admin. Code. r. 299.9306(1)-(3) [40 C.F.R. § 262.34(a)-(c)]. EPA has identified the license exemption conditions with which Roush was out of compliance at the time of the inspection in paragraph 1, below.

Many of the conditions for a RCRA license exemption are also independent requirements that apply to licensed and interim status hazardous waste management facilities that treat, store, or dispose of hazardous waste (TSD requirements). When a hazardous waste generator loses its license exemption due to a failure to comply with an exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o), the generator: (a) becomes an operator of a hazardous waste storage facility; and (b) simultaneously violates the corresponding TSD requirement. The exemption condition identified in paragraph 1 is also independent TSD

requirements incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o). Accordingly, each failure of Roush to comply with these conditions is also a violation of the corresponding requirement in Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o) [40 C.F.R. Part 265].

Finally, EPA has determined that Roush violated RCRA requirements related to hazardous waste determinations and recordkeeping, as described in paragraphs 1 - 2, below.

STORAGE OF HAZARDOUS WASTE WITHOUT A LICENSE OR INTERIM STATUS AND VIOLATIONS OF TSD REQUIREMENTS

At the time of the inspection, Roush was out of compliance with the following large quantity generator license exemption conditions:

1. Training Records

A large quantity generator of hazardous waste must have a program of classroom instruction or on-the-job training that teaches facility personnel to perform their duties in a way that ensures the facility's compliance with requirements of RCRA. This program must be directed by a person trained in hazardous waste management procedures, and must include instruction that teaches facility personnel hazardous waste management procedures (including contingency plan implementation) relevant to the positions in which they are employed. *See* Mich. Admin. Code. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(a)]. Facility personnel must successfully complete this training program within six months after the date of their employment or assignment to a facility or to a new position at a facility, and must take part in an annual review of this initial training thereafter. *See* Mich. Admin. Code. r. 299.9306(1)(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(b) and (c)].

With respect to this training program, a large quantity generator must maintain the following documents and records at its facility:

- 1) The job title for each position at the facility related to hazardous waste management and the name of the employee filling each job;
- 2) A written job description for each position at the facility related to hazardous waste management;
- 3) A written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management; and

- 4) Records that document that the training or job experience described above has been given to and completed by facility personnel. *See* Mich. Admin. Code. r. 299.9306(1)(d), 40 C.F.R. § 265.16(d) [40 C.F.R. §§ 262.34(a)(4) and 265.16(d)].

At the time of the inspection, Roush did not have and was unable to provide in response to a request records that document the employee training for calendar years 2011 and 2012.

Summary: By failing to comply with the conditions for a license exemption, above, Roush became an operator of a hazardous waste storage facility, and was required to obtain a Michigan hazardous waste operating license. Roush failed to apply for such a license. Roush's failure to apply for and obtain a hazardous waste storage license violated the requirements of Mich. Admin. Code. r. 299.9502(1), 299.9508 and 299.9510 [40 C.F.R. §§ 270.1(c), and 270.10(a) and (d)]. Any failure to comply with a license exemption condition incorporated from Mich. Admin. Code. r. 299.9601(1)-(3) and 299.11003(1)(m)-(o) is also an independent violation of the corresponding TSD requirement.

OTHER VIOLATIONS

Roush violated the following generator requirements:

2. Hazardous Waste Determination and Land Disposal Restriction Applicable Treatment Standards.

Under Mich. Admin. Code. r. 299.9302(1) [40 C.F.R. § 262.11], a generator must determine whether its waste is hazardous. Under Mich. Admin. Code r. 299.9311(40 CFR § 268.9(b)), Where a prohibited waste is both listed under 40 CFR part 261, subpart D and exhibits a characteristic under 40 CFR part 261, subpart C, the treatment standard for the waste code listed in 40 CFR part 261, subpart D will operate in lieu of the standard for the waste code under 40 CFR part 261, subpart C, provided that the treatment standard for the listed waste includes a standard for the constituent that causes the waste to exhibit the characteristic. Otherwise, the waste must meet the treatment standards for all applicable listed and characteristic waste codes.

At the time of the inspection, Roush had determined that the waste paint related material generated during closure of its painting line was nonwastewater, D001 High TOC Ignitable Liquids, D035 (no subcategory, concentration-based treatment standard in 40 CFR § 268.40 plus meeting universal treatment standards), and F003/F005 (listed waste with concentration-based treatment standards for 28 regulated hazardous constituents in § 268.40). The Land Disposal Restriction Notification Form for manifest 004826869FLE lists five underlying hazardous constituents and, by use of "N" to complete its form, identifies none of them as "contaminants subject to treatment." All of the five underlying hazardous constituents are found in the treatment standards for listed solvents in 40 CFR

268.40, and 40 CFR 268.48 provides universal treatment standards for all five constituents. The information on the notification form conforms to the Notification requirement of 40 CFR 268.7 but provides incorrect information regarding applicability of the listed waste treatment standards.

3. Used Oil Generator Off-site Shipment

Under Mich. Admin. Code. r. 299.9810(3) [40 C.F.R. § 279.24], "Off-site shipments," used oil generators must ensure that their used oil is transported only by transporters who have obtained EPA identification numbers except for self-transportation of small amounts to approved collection centers or to aggregation points owned by the generator. "Used oil generator" means any person, by site, whose act or process produces used oil to become subject to regulation. "On-site" means on the same or geographically contiguous property which may be divided by public or private right(s)-of-way, provided the entrance and exit between the properties is at a cross-roads intersection, and access is by crossing as opposed to going along, the right(s)-of-way. Non-contiguous properties owned by the same person but connected by a right-of-way which the person controls and to which the public does not have access, is also considered on-site property. Generators may transport, without an EPA ID number, used oil that is generated at the generator's site to an aggregation point provided that:

- (1) The generator transports the used oil in a vehicle owned by the generator or owned by an employee of the generator;
- (2) The generator transports no more than 55 gallons of used oil at any time;
- (3) The generator transports the used oil to an aggregation point that is owned and/or operated by the same generator.

At the time of the inspection, you described the transportation of used oil along Market Street to a site owned and/or operated by Roush. A used oil aggregation point is any site or facility that accepts, aggregates, and/or stores used oil collected only from other used oil generation sites owned or operated by the owner or operator of the aggregation point, from which used oil is transported to the aggregation point in shipments of no more than 55 gallons under the provisions of the § 279.24.

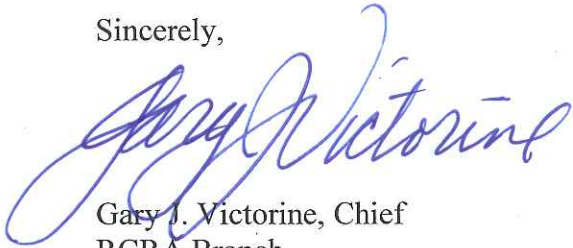
At this time, EPA is not requiring Roush to apply for a Michigan hazardous waste storage license because Roush had completed closure of its generator of hazardous waste manufacturing and accumulation area before the inspection.

Due to the nature of the violations and closure of the hazardous waste-generating painting line, it is not possible for you to return to compliance with respect to violations 1 and 2 above. The owner or operator of a used oil aggregation center described in violation 3 above is not required to notify EPA of its regulated waste activity. Therefore, EPA is not planning additional enforcement actions based on this inspection at this time. This letter does not limit the

applicability of the requirements evaluated, or of other federal or state statutes or regulations. EPA appreciates Roush's cooperation.

If you have any questions regarding this letter, please contact Ms. Sue Brauer, of my staff, at (312) 353-6134 or at brauer.sue@epa.gov.

Sincerely,



Gary J. Victorine, Chief
RCRA Branch

Enclosure

cc: Tracy Kecskemeti, (KecskemetiT@michigan.gov)
John Craig (craigj@michigan.gov)
Lonnie Lee (leel@michigan.gov)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5, LCD, RCRA Branch, LR-8J
77 W. JACKSON BLVD.
CHICAGO, IL 60604

RCRA COMPLIANCE EVALUATION INSPECTION REPORT

SITE NAME: ROUSH ENTERPRISES INC

EPA ID NUMBER: MID094555299

ADDRESS: 12068 MARKET ST
LIVONIA MI 48150

DATES OF INSPECTION: August 29 and 31, 2012

EPA INSPECTOR: Sue Rodenbeck Brauer
Environmental Scientist

PREPARED BY:

Sue Rodenbeck Brauer July 12, 2013
Sue Rodenbeck Brauer Date
Compliance Section 2

ACCEPTED BY:

Wanda Tancos 7/15/2013
Mirtha Capiro, Acting Chief Date
Compliance Section 2

Purpose of Inspection

This inspection was an evaluation of Roush Enterprises Inc.'s compliance with hazardous waste regulations found at Michigan Administrative Code Rules (MAC Rules), Parts 1 through 8 and the Code of Federal Regulations (CFR), Parts 260-279. I performed the inspection without an MDEQ inspector present. The inspection was an EPA lead Resource Conservation and Recovery Act (RCRA) compliance evaluation inspection (CEI). The site notified as a large quantity generator (LQG).

Participants

Inspector(s):

Sue Rodenbeck Brauer, Environmental Scientist, EPA

Site Representative(s):

Mark Gomez, Coordinator, Environmental Health & Safety Coordinator, Facilities

Introduction

On August 29, 2012, I arrived at 12068 Market Street in Livonia, Michigan at 9:45 a.m. I learned from the receptionist that Mr. Gomez' office is in Building 7, next door to the south. I introduced myself to Mr. Gomez, presented my enforcement officer credentials, and handed Mr. Gomez a business card. Mr. Gomez informed me that he had scheduled an inspection of a hydrogen tank with an MDEQ inspector in the afternoon, so I agreed to finish the inspection on August 31, 2012. This did not require a changing my travel plans.

According to RCRAInfo, the facility had not been inspected since 2006. Mr. Gomez started with Roush in July 2008. Mr. Gomez stated that there are over 4,000 Roush employees worldwide; there were nine employees on the paint line and 104 employees in the building. I provided a Small Business Resources information sheet anyway.

Site Description

The buildings are part of Roush's "Livonia Campus" (map in Appendix A). Mr. Gomez described the regulated activities generating hazardous waste in Building 28, painting injection-molded plastic parts, as having stopped in December 2011.

Site Tour

Mr. Gomez led the Building 28 site tour on August 31, 2012. I observed that injection molding continues at this facility. The paint line had been dismantled; see photographs P1010258 through P1010262 in Appendix A. Supplies for a re-lamping project were staged in the old paint line area.

I observed facility molding operations in Building 28, used oil storage, and emergency equipment. I took photographs of used oil totes and closure of the former paint line location in Building 28 during the site tour. The used oil totes were labeled. One RCRA-empty tote had a defective valve and leaked when in the upright position; a note to keep the tote upside-down could have prevented workers from turning it right-side up.

Records Review

I provided Mr. Gomez with a list of documents I wished to review. On August 29, 2012, I reviewed five manifests with 2012 dates, three manifests with 2010 dates, and the associated land disposal restriction notifications. See photos P1010192 through P1010196 in Appendix A. I also reviewed Material Safety and Data Sheets for Mobil DTE hydraulic oil, Gage purge solvent, DuPont basecoat, DuPont primer, and DuPont clearcoat. The hydraulic oil MSDS stated that the unused product is not ignitable, corrosive, reactive, or toxic (by TCLP determination). I reviewed waste profiles/characterizations, waste analysis records (e.g., manufacturer analysis of ten T8 GE Ecolux Fluorescent Lamps), manifests, land disposal restriction (LDR) notifications (e.g., Clean Harbors' explanation of why underlying hazardous constituents are not identified for waste to be treated by CMBST), and the contingency plan. Fully regulated generator and universal waste generator inspection checklists are in Attachment C.

During review of records, the absence of employee training records, a home address for the Emergency Coordinator, an improper used oil tracking document, and the absence of underlying hazardous constituents in waste to be incinerated were noted. Mr. Gomez and I discussed whether a used oil tracking record would be treated as CBI, and he agreed that I could show this liquid industrial waste manifest to a Crystal Clean manager. This record was copied during the inspection, *see* Attachment D.

Closing Conference

We summarized the land disposal restriction and waste identification issues identified during the inspection. Mr. Gomez did not make any CBI claims. The inspection concluded at approximately 3:00 PM.

Attachments

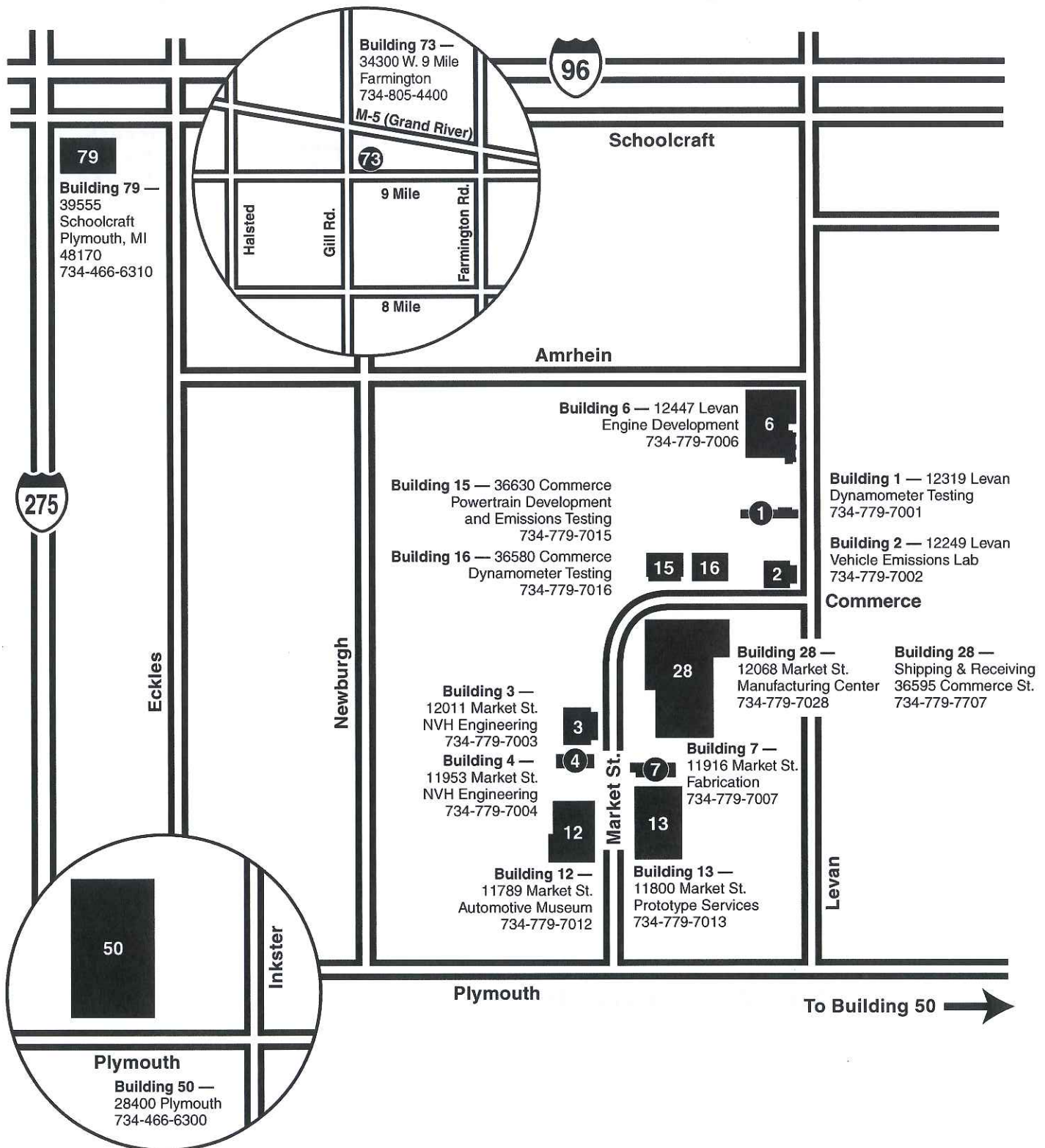
- A. Site Diagram for Building 28 at 12068 Market Street, Livonia
- B. Photographs and Photo Log
- C. Checklists
- D. Document(s) Copied

ATTACHMENT A
Site Diagram



LIVONIA CAMPUS

Roush. From start to finish.



Raptor
Truck

Roush
Mustang
Conversions

Bldg 7 no EPA ID

EMERGENCY PLAN

ROUSH

BUILDING 28

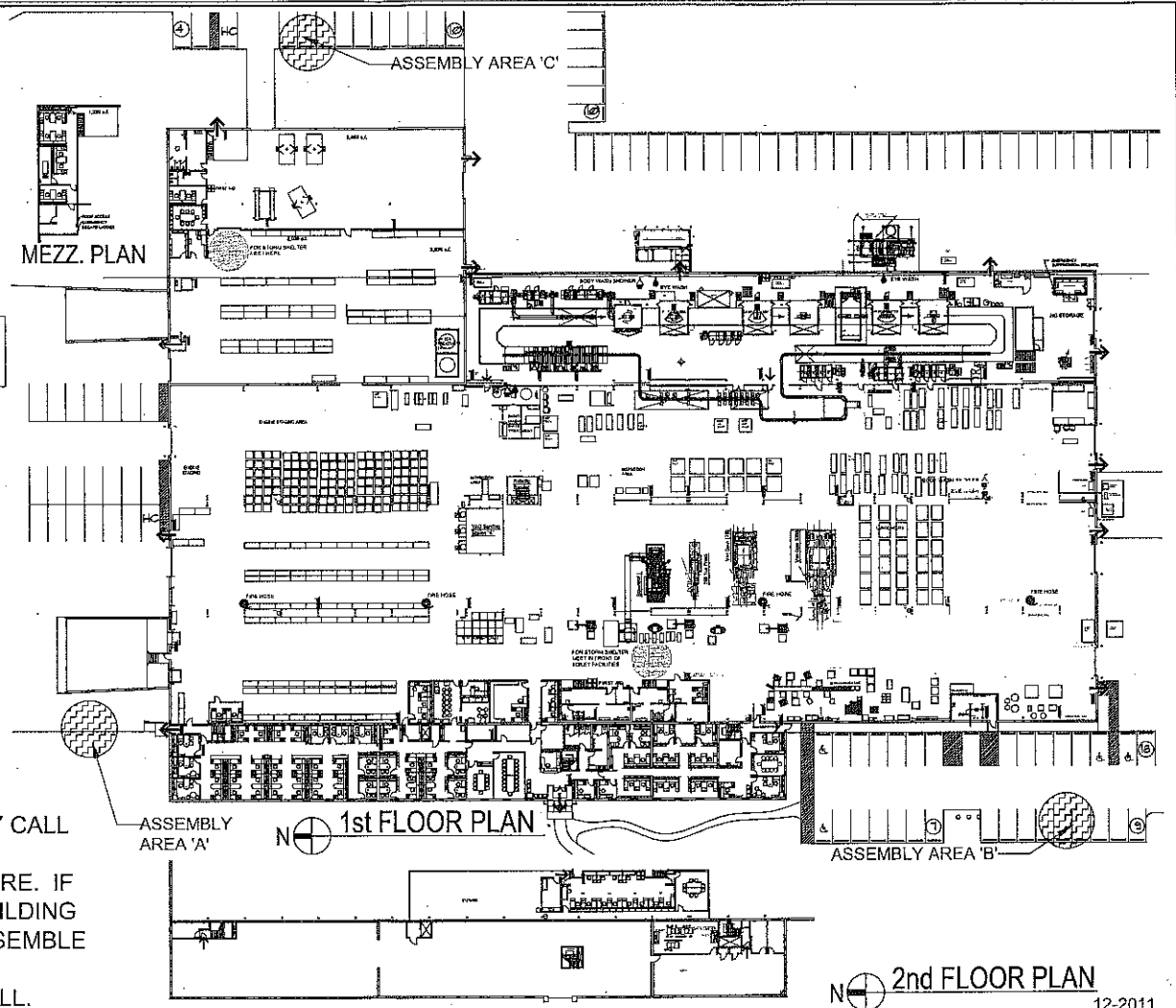
THIS ADDRESS IS:

12068 MARKET STREET
LIVONIA, MI (734) 779-7028

SAFETY LEGEND

-  FIRE EXTINGUISHER
-  FIRE EXIT
-  SPILL KIT
-  EYE WASH
-  FIRST AID
-  STORM SHELTER
-  FIRE HOSE
-  BODY WASH SHOWER
-  OXYGEN
-  MSDS BOOK

IN THE EVENT OF AN EMERGENCY CALL 911. THEN NOTIFY THE BUILDING MANAGER. SOUND ALARM FOR FIRE. IF YOU HEAR A FIRE ALARM EXIT BUILDING IN AN ORDERLY MANNER AND ASSEMBLE AT YOUR DESIGNATED AREA. MANAGERS WILL TAKE A ROLL CALL.



SAB received 8/22/12

former
strength
over
for
HW
MO

11

EMERGENCY PLAN

ROUSH

BUILDING 28

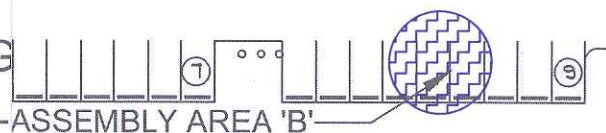
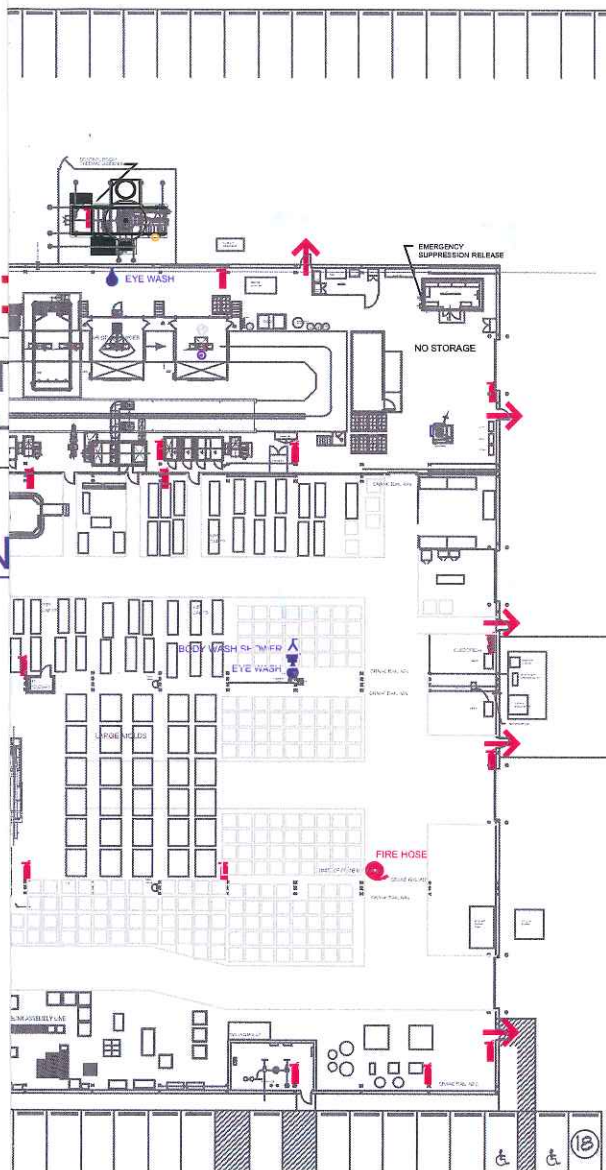
THIS ADDRESS IS:

12068 MARKET STREET
LIVONIA, MI (734) 779-

SAFETY LEGEND

-  FIRE EXTINGUISHER
-  FIRE EXIT
-  SPILL KIT
-  EYE WASH
-  FIRST AID
-  STORM SHELTER
-  FIRE HOSE
-  BODY WASH SHOWER
-  OXYGEN
-  MSDS BOOK

IN THE EVENT OF AN EMERGENCY, CALL 911. THEN NOTIFY THE BUILDING MANAGER. SOUND ALARM FOLLOWING YOU HEAR A FIRE ALARM EXERCISE IN AN ORDERLY MANNER AND PROCEED TO YOUR DESIGNATED AREA. BUILDING MANAGERS WILL TAKE A ROLL CALL.



2nd FLOOR PLAN

12-2011

ATTACHMENT B

Photographs

RCRA Inspection Photo-Log
 Photographer: Sue Rodenbeck Brauer
 Location: Roush Enterprises Inc.
 Date(s): August 29 and 31, 2012

Photo #	Description	Date
P1010191	Street view of 12068 Market Street	8/29/12
P1010192	Manifest 004815316 FLE	8/31/12
P1010193	Land Disposal Restriction Notification for Manifest 004815316 FLE	8/31/12
P1010194	Manifest 005236545 FLE	8/31/12
P1010195	Manifest 005236545 FLE	8/31/12
P1010196	Land Disposal Restriction Notification for Manifest 005236545 FLE	8/31/12
P1010255	Tote labeled "Used Hydraulic Oil"	8/31/12
P1010256	Same tote of "Used Hydraulic Oil as in P1010197	8/31/12
P1010257	Additional tote of "Used Hydraulic Oil"	8/31/12
P1010258	Former paint line generated hazardous waste is this area. Re-lamping supplies are staged at the left foreground.	8/31/12
P1010259	Concrete was poured in the former location of the sludge pit for a water wash (part of former paint line).	8/31/12
P1010260	Freshly finished concrete.	8/31/12
P1010261	Mr. Gomez did not know the function of the space beneath the manhole cover.	8/31/12
P1010262	Freshly finished concrete.	8/31/12



Photo P1010191. Street view of 12068 Market Street, Livonia, Michigan. 8/31/12.

Please print clearly. (Form designed for use on site (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 0009455299

2. Page 1 of 1

3. Emergency Response Phone: (800) 482-3749

4. Manifest Tracking Number: 00-815316 FLE

5. Generator's Name and Mailing Address: Roush Manufacturing, 11916 Market Street, Livonia, MI 48150

6. Generator's Phone: (734) 779-7269

7. Generator's Site Address (if different than mailing address): 1206B Market Street, Livonia, MI 48150

8. Transporter 1 Company Name: Clean Harbors Environmental Services Inc.

9. Designated Facility Name and Site Address: Clean Harbors Environmental Services Inc., 4979 Spring Grove Avenue, Cincinnati, OH 45232

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)): UN1263, WASTE PAINT RELATED MATERIAL, 3, PG II

11. Containers: 15 DM 6750 P

12. Total Quantity: 15 DM 6750 P

13. Waste Codes: 0001, 0035, F003

14. Special Handling Instructions and Additional Information: 1. CH235257 15X55ERG#128

15. GENERATOR'S OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's Signature: Alex Mastaglio

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials: Transporter 1 Printed/Typed Name: GERARD A. PETERS, Signature: Gerard A. Peters, Month/Day/Year: 11/5/12

Transporter 2 Printed/Typed Name: Chris Hagan, Signature: Chris Hagan, Month/Day/Year: 11/5/12

18. Discrepancy: 18a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

18b. Alternate Facility (or Generator): Manifest Reference Number: U.S. EPA ID Number:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems): 1. HXAS

20. Designated Facility Owner or Operator Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a: Signature: Date: 11/16/12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

Photo P1010192

B-3



Land Disposal Restriction
Notification Form

Page: 1 of 1

Printed Date: Jan 04, 2012

MANIFEST INFORMATION

Generator: Roush Manufacturing	Manifest Tracking Info:
Address: 12068 Market Street Livonia, MI 48150	004815316FLE
EPA ID #: MID094555299	Sales Order No: D54026061

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category:
1	1	CH235257	NON-WASTEWATER	2 (This is subject to LDR)

EPA Waste Code	EPA Waste SubCategory
D001	High TOC Ignitable Liquids
D035F003F005	NONE

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ETHYL BENZENE	N	Y	N
ETHANOL	N	Y	N
METHYL ETHYL KETONE	N	Y	N
TOLUENE	N	Y	N
XYLENES (MIXED ISOMERS)	N	Y	N

Certification

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.	Applies to Manifest Line Items 1.
--	--------------------------------------

Waste analysis data, where available, is attached.

Signature: <i>Alex Koshtin</i>	Print Name: Alex Koshtin
Title: _____	Date: 1-5-12

photo P1010193

B-4

[illegible]

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number: 05438992

2. Page 1 of 1

3. Emergency Response Phone: 800-422-7148

4. Manifest Tracking Number: 005236545 FLE

5. Generator's Name and Mailing Address: Raysh Manufacturing, 11815 Market Street, Livonia, MI 48150

6. Generator's Phone: (734) 779-7266

7. Transporter 1 Company Name: Clean Harbors Environmental Services Inc

8. Designated Facility Name and Site Address: Spring Grove Resource Recovery Inc, 4879 Spring Grove Avenue, Cincinnati, OH 45232

9. Facility's Phone: (513) 681-5736

10. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any)): RC UN1263 WASTE PAINT RELATED MATERIAL 3. PG II (D001)

11. Containers: 37 Dr 700 P

12. Unit: P

13. Waste Codes: D001, D035, F003, F005

14. Special Handling Instructions and Additional Information: 1. CH225257 ERG#125 2005, 17/16

15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/cleaned, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a), (if I am a large quantity generator) or (b), (if I am a small quantity generator) is true.

Generator's Name: JAMES WENZEL

Signature: [Signature]

Month: 06, Day: 12, Year: 12

16. International Shipments: ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit: Date leaving U.S.:

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: STEPHEN GAWICK

Signature: [Signature]

Month: 06, Day: 12, Year: 12

Transporter 2 Printed/Typed Name: GERALD A. PETERS

Signature: [Signature]

Month: 06, Day: 15, Year: 12

18. Discrepancy

19a. Discrepancy Indication Space: ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

19b. Alternate Facility (or Generator): Manifest Reference Number: U.S. EPA ID Number:

19c. Signature of Alternate Facility (or Generator):

19d. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems): 1. H061

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 19a: [Signature]

Month: 06, Day: 12, Year: 12

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

Clean Harbors has the appropriate permits for and will accept the waste the generator is shipping.

DESIGNATED FACILITY TO GENERATOR

Photo P1010195



Land Disposal Restriction
Notification Form

Page: 1 of 1

Printed Date: Jun 11, 2012

Generator: Roush Manufacturing
Address: 12068 Market Street
Livonia, MI 48150

Manifest Tracking Info:
005236545FLE

EPA ID #: MID094555299

Sales Order No: D54385662

ONE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category:
	1	CH235257	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code	EPA Waste SubCategory
D001 D035FD03F005	High TOC Ignitable Liquids NONE

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ETHYL BENZENE	N	Y	N
METHANOL	N	Y	N
METHYL ETHYL KETONE	N	Y	N
TOLUENE	N	Y	N
XYLENES (MIXED ISOMERS)	N	Y	N

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

Waste analysis data, where available, is attached.

Signature:

Print Name

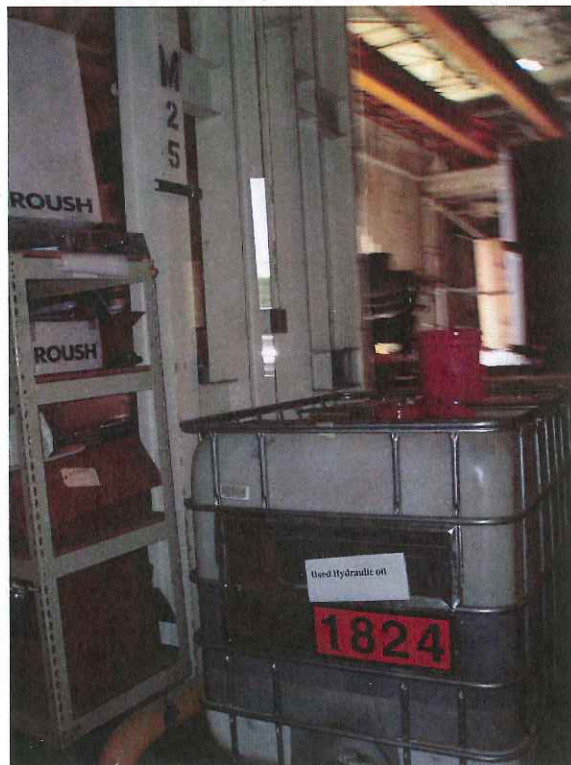
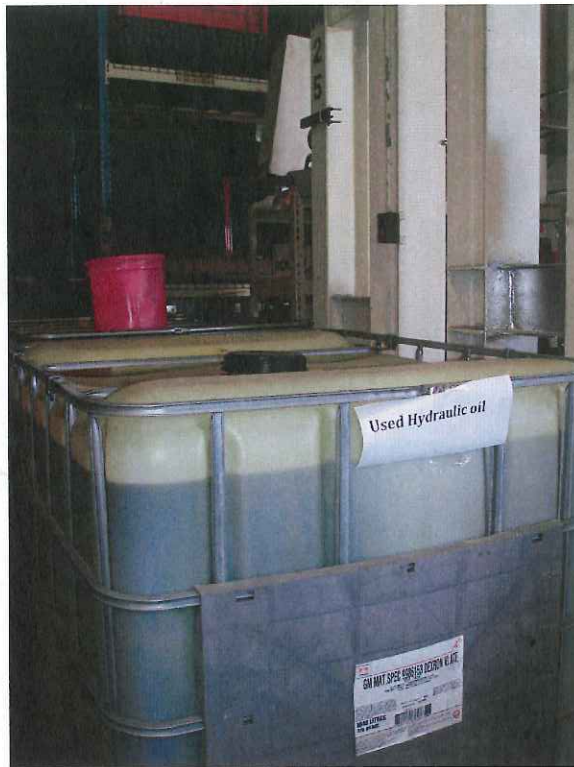
Title:

Date:

James Wenzel
6/11/12

Photo 71010196

B-7



Photos P1010256 & P1010255



Photo P1010257



Photo P1010258



Photos P1010259

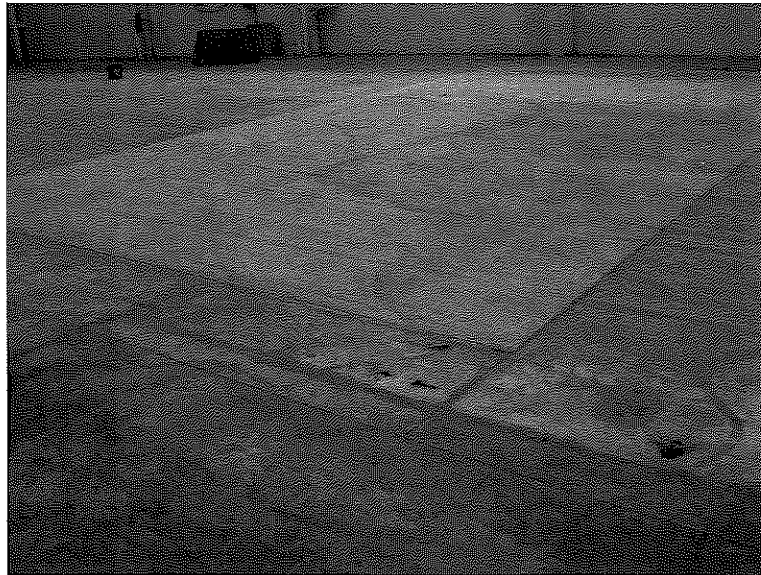


Photo PP1010260

B-10



P1010261



P1010262

ATTACHMENT C

Checklists

Department of Natural Resources & Environment
HAZARDOUS WASTE INSPECTION

INSPECTION DATE 8/29/2012 GEN. I.D.# MID 094555 ²⁹⁹ WDS ID# _____
 SITE SPECIFIC NAME ROUSH ENTERPRISES INC.
 SITE LOCATION ADDRESS 12068 MARKET ST
 CITY LIVONIA ZIP: 48150 COUNTY WAYNE

Reason for Inspection: ☒ CEI ☐ FCI ☐ FUI ☐ CSE ☐ CAC ☐ COMPLAINT ☐ NRR ☐ OTHER

WASTE CODE	PROCESS WASTE IS GENERATED FROM	

PERSON(S) INTERVIEWED	TITLE	TELEPHONE NUMBER

INSPECTOR'S NAME	AGENCY	TELEPHONE NUMBER
	MICHIGAN DEPT OF NATURAL RESOURCES & ENVIRONMENT	
Sue Brauer	U.S. EPA	312-353-6134

PRIMARY BUSINESS OF FACILITY: auto industry consulting

APPROX./AVG. # OF EMPLOYEES: 70 here DAYS/HRS OPERATION _____
Roush campus is bigger than EPA ID # facility
 FACILITY SIZE _____ PHOTOS TAKEN _____ YES _____ NO

CHRONOLOGY OF INSPECTION & AREAS INSPECTED :

- | | | |
|-------------------------------|----------|----------|
| 1) <u>bldg. 28 conf. room</u> | 4) _____ | 7) _____ |
| 2) _____ | 5) _____ | 8) _____ |
| 3) _____ | 6) _____ | 9) _____ |

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[illegible]

CHECK FORMS USED	GENERAL CATEGORIES OF FACILITIES
	SITE SPECIFIC PERMITTED T S D F
	PERMITTED GENERAL T S D F
	INTERIM GENERAL T S D F
	GENERATOR APPENDIX
	TANK SYSTEM
	PERMITTED SURFACE IMPOUNDMENT
	PERMITTED WASTE PILE
	PERMITTED LAND TREATMENT
	PERMITTED LANDFILL
	MISCELLANEOUS UNITS
	PERMITTED ORGANIC AIR EMISSIONS- PROCESS VENTS
	PERMITTED ORGANIC AIR EMISSIONS- EQUIPMENT LEAKS
	INTERIM GW MONITORING (USE WITH SUBPARTS K,L, M, & N)
	INTERIM SURFACE IMPOUNDMENT
	INTERIM WASTE PILE
	INTERIM LAND TREATMENT
	INTERIM LANDFILL
	INTERIM CHEMICAL, PHYSICAL & BIOLOGICAL TREATMENT
	INTERIM ORGANIC AIR EMISSIONS FROM PROCESS VENTS
	INTERIM ORGANIC AIR EMISSIONS FROM EQUIPMENT LEAKS

Does Is the facility subject to air emission standards for process vents managing hazardous waste with organic concentrations of at least 10 ppmw? If yes, circle the type of operation(s): DISTILLATION FRACTIONATION THIN-FILM EVAPORATION SOLVENT EXTRACTION AIR OR STREAM STRIPPING (If yes, send a copy of this cover sheet to AQD).

DATE _____

Department of Natural Resources & Environment
FULLY REGULATED GENERATOR (FRG) INSPECTION FORM

Facility's Name Roush Enterprises Part 3 Rules
Date 8/29/2012 ID# MID 094 555 299 1994 PA 451

HAZARDOUS WASTE AND WASTE #	SOURCE	HOW MUCH
<u>D002</u>	<u>corrosive bath for painting prep</u>	
<u>D001 D035 F003 F005</u>	<u>paint related waste</u>	

___ abbreviated

FACILITY COMPLIANCE REQUIRED IN ALL AREAS

WASTE DETERMINATION (Rule 302: 40 CFR 262.11)

(NI = Not inspected; N/A = Not applicable)

		YES	NO
1. Determined if waste streams are hazardous waste? (Rule 302: 40 CFR 262.11))	262A	<input checked="" type="checkbox"/>	NI N/A
a) copy of waste evaluation on-site 3 years? (Rule 307(1): 40 CFR 262.40(c))	262D	<input checked="" type="checkbox"/>	NI N/A
b) re-evaluated waste when changes in materials or process? (Rule 302(3))	262A	<input checked="" type="checkbox"/>	NI N/A
2. Did generator have written waste analysis plan if treating wastes on-site? (Rule 306)(1)(d):40 CFR 268.7(a)(5))	262C	<input type="checkbox"/>	NI N/A
IDENTIFICATION NUMBER (Rule 303: 40 CFR 262.12)			
3. Has the generator obtained an identification number? (Rule 303: 40 CFR 262.12)	262A	<input checked="" type="checkbox"/>	NI N/A

MANIFEST REQUIREMENTS (Rule 304: 40 CFR 262.20)

4. Copies of the manifest readily available for review & inspection? (Section 11138(1)(f))	FSS	<input checked="" type="checkbox"/>	NI N/A
5. Manifests kept for the past 3 years? (Rule 307(3): 40 CFR 262.20(a))	262D	<input checked="" type="checkbox"/>	NI N/A
6. Manifests, prepared by the generator according to instructions in appendix of Part 262 contain the following:			
a) manifest document number (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
b) generator's name, address, phone & ID # (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
c) name & ID # of the transporter. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
d) name, address & ID # of TSDF. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
e) DOT description of waste(s). (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
f) quantity of waste, type & # of containers. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
g) hazardous waste number of the wastes. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
h) generator signature, initial transporter & date of acceptance. (Rule 304(1)(b): 40 CFR 262.20(a)(i)),	262B	<input checked="" type="checkbox"/>	NI N/A
7. Submitted copy of manifests to Director no later than 10 days after month shipment was made? (Rule 304(2)(b))	262B	<input type="checkbox"/>	NI N/A
8. For out-of-state manifests, if not submitted by designated facility, generator submitted copy of 3 rd signature manifest as requested by Director? (Rule 304(2)(c))	262B	<input type="checkbox"/>	NI N/A
9. Is the transporter used properly registered &/or permitted under Act 138, Sec. 2 (3)? (Rule 304(1)(c))	262B	<input type="checkbox"/>	NI N/A

NOTE: For shipments of hazardous waste solely by water or rail shipments, within United States see Rule 304(4)(g or h).

10. Using manifest that has expired? (Rule 304(1)(a) : 40 CFR 262.20) <u>using EPA form 8700-22 (Rev 3-05)</u>	262B	<input checked="" type="checkbox"/>	NI N/A
11. Reportable exceptions (Rule 308(3): 40 CFR 262.42)(a)(b))			
a) number of manifests generator HASN'T receive signed copy from TSD w/in 35 days:		<u>zero</u>	
b) number of manifests generator HASN'T submitted exception reports to RA & DEQ after 45 days:			
12. Facility has written program to reduce volume/toxicity/recycle wastes? (Rule 304(1)(b):40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A
<u>stopped generating paint line wastes</u>			
13. Facility discusses program in place to reduce volume/toxicity/recycle of waste (Rule 304(1)(b): 40 CFR 262.27(a))	262B	<input checked="" type="checkbox"/>	NI N/A

LAND DISPOSAL RESTRICTION REQUIREMENTS
WASTE ANALYSIS AND RECORDKEEPING (Rule 311(1): 40 CFR 268.7))

YES NO

14. Did the generator determine if the waste is restricted from land disposal? (Rule 311(1): 40 CFR 268.7(a)(1))		
a) all listed waste	268A	<input checked="" type="checkbox"/> NI N/A
b) all characteristic wastes?	268A	<input checked="" type="checkbox"/> NI N/A

NOTE: If waste has both listed & characteristic waste codes, the treatment standard for the listed waste is sufficient if the treatment standards for the listed waste includes a standard for the constituent that caused the waste to exhibit the characteristic, except for D001 and D002. (40 CFR 268.9(b))

15. If restricted waste exceeds treatment standards or prohibitions did notice go w/ initial shipment? (Rule 311(1):40 CFR 268.7(a)(2))	268A	<input checked="" type="checkbox"/> NI N/A
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OR

16. If restricted waste does not exceed treatment standards or prohibitions did a notice and certification statement go with initial shipment? (Rule 311(1): (40 CFR 268.7(a)(3))	268A	<input type="checkbox"/> NI N/A
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OR

17. If waste has exemption from prohibition on the type of land disposal method utilized for the waste, did a notice go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(4))	268A	<input type="checkbox"/> NI N/A
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OR

18. If facility choose alternative treatment standard for lab pack that contains none of the waste in appendix IV, did a notice & certification go with initial shipment? (Rule 311(1): 40 CFR 268.7(a)(9))	268A	<input type="checkbox"/> NI N/A
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19. Did the notice include: (Rule 311(1): 40 CFR 268.7(a)(1) or 268.7(a)(2) or 268.7(a)(3))		
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a) EPA hazardous waste #?	268A	<input checked="" type="checkbox"/> NI N/A
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b) if wastewater or non-wastewater as defined in 268.2(d&f)?	268A	<input checked="" type="checkbox"/> NI N/A
--	------	--

c) subcategory of the waste (such as D003 reactive cyanide) if applicable?	268A	<input checked="" type="checkbox"/> NI N/A
--	------	--

d) manifest number associated with the shipment?	268A	<input checked="" type="checkbox"/> NI N/A
--	------	--

e) waste analysis data, where available?	268A	<input checked="" type="checkbox"/> NI N/A
--	------	--

f) waste constituents that the treater will monitor, if monitoring will not include all regulated constituents, for F001- F005, F039, D001, D002, D012-D043? (treatment standards for hazardous waste in table in 268.40 for the waste code under regulated constituents)	268A	<input type="checkbox"/> NI N/A
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UNLESS

g) did generator/treater claim they are going to monitor for ALL regulated constituents in the waste in lieu of the generator indicating same in the notice? (Rule 311(1): 40 CFR 268.7(a)(1) & 268.9)	268A	<input checked="" type="checkbox"/> NI N/A
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h) did generator/treater claim they are going to monitor for underlying hazardous waste constituents (except vanadium and zinc), reasonably expected to be present at the generation point, above UTS standards for D001, D002 & TCLP organics? Rule 311(1): 40 CFR 268 Subpart D & 268.48)	268A	<input checked="" type="checkbox"/> NI N/A
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20. Other than notices for waste exceeding treatment standards, did notices include: (Rule 311(1): 40 CFR 268.7(2)(3))		
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a) if the notice is for shipments that meet the standards does the notice include the certification?	268A	<input type="checkbox"/> NI N/A
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b) if the notice is for shipments under prohibitions does the notice include a statement that the waste isn't prohibited from land disposal & date the waste is subject to prohibition?	268A	<input type="checkbox"/> NI N/A
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NOTE: An alternate treatment standard may be used after approval from the Administrator. (40 CFR 268.44)

NOTE: Hazardous waste debris see 40 CFR 268.7(a)(1)(iv) for the notice requirements which must be followed by the statement "This hazardous debris is subject to alternative treatment standards of 40 CFR 268.45."

21. Generator retain on-site records to support determination from knowledge or results from tests? (40 CFR 268.7(a)(6))	268A	<input checked="" type="checkbox"/> NI N/A
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22. If the restricted waste is excluded from being a hazardous waste or solid waste did the generator place a one- time notice stating same in the facility file? (40 CFR268.7(a)(7))	268A	<input type="checkbox"/> NI N/A
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23. All notices/certifications/demonstrations/other documents retained for 3 years on-site? (40 CFR 268.7(a)(8))	268A	<input checked="" type="checkbox"/> NI N/A
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NOTE: This requirement (268.7(a)(8)) applies to solid waste even when the hazardous waste characteristic is removed prior to disposal or when the waste is excluded from the definition of hazardous waste or solid waste.

DILUTION PROHIBITED AS SUBSTITUTE FOR TREATMENT (RULE 311(1):40 CFR 268.3)

24. Generator dilute hazardous waste or treatment residue of a hazardous waste to avoid prohibition? (40 CFR: 268.3(a))	268A	<input checked="" type="checkbox"/> NI N/A
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TREATMENT STANDARDS (RULE 311(1):40 CFR 268.40)

25. If wastes exceeding treatment standards are mixed, was the most stringent standards selected? (40 CFR268.40(c))	268A	<input type="checkbox"/> NI N/A
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BIENNIAL REPORT (Rule 308: 40 CFR 262.41)

26. Generator submitted biennial report by 3/1 (even years)? (Rule 308(1): 40 CFR 262.41)	262D	<input checked="" type="checkbox"/> NI N/A
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27. Were copies of the report retained at least 3 years? (Rule 307(4): 40 CFR 262.40(b))	262D	<input checked="" type="checkbox"/> NI N/A
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PRE-TRANSPORTER REQUIREMENTS (Rule 305: 40 CFR 262.30)

YES NO

28. Waste packaged according to DOT regulations (required before shipping waste off-site)? (Rule 305(1)(a):40 CFR262.30))	262C	co.said y obsrsvd <input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
29. Are waste packages marked & labeled per DOT 49 CFR172 concerning hazardous materials (required before shipping waste off- site)?(Rule 305(1)(b)(c): 40 CFR 262.32(a))	262C	co.said y obsrsvd <input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
30. On containers of 119 gallons or less, is there a warning, generator's name, address, site identification number, manifest tracking number & waste code per DOT 49 CFR172.304? (Rule 305(1)(d): 40 CFR 262.32(b))	262C	co.said y obsrsvd <input type="checkbox"/> <input checked="" type="checkbox"/> NI N/A
31. If required (>1000 #'s), are placards available to the transporter? (Rule 305(1)(e): 40 CFR 262.33)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

ACCUMULATION TIME (Rule 306: 40 CFR 262.34)

32. If hazardous waste accumulated in containers: (If no, skip to #35)		
a) containers have accumulation date which is clearly visible? (Rule 306(1)(b): 40 CFR 262.34(a)(2))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) container have words "Hazardous Waste"? (Rule 306(1)(c): 40 CFR 262.34(a)(3))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) is each container clearly marked with the hazardous waste number? (Rule 306(1)(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d) has more than 90 days elapsed since date marked? (Rule 306(1))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

OR

e) one of the following apply:		
i) the generator applied for & received an extension to accumulate longer? (Rule 306(3): 40 CFR 262.34(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
ii) it is F006 waste recycled for metals recovery in compliance with Rule 306 (7) (180 days maximum). Rule 306(7):40 CFR 262.34(g))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iii) it is F006 waste recycled for metals recovery in compliance with Rule 306(7) which must be transported more than 200 miles (270 days max.)? (Rule 306(8):40 CFR 262.34(h))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iv) generator applied for & received extension or exception to accumulate F006 haz waste longer than ii or iii above? (Rule 306(9-10):40 CFR 262.34(i))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

The following Subpart I, 265.170 to 265.177 requirements are referred to by Rule 306(1)(a) and 40 CFR 262.34(a)(1).

f) are containers in good condition? (265.171)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
g) are containers compatible with waste in them (265.172)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
h) are containers stored closed? (265.173(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
i) containers handled/stored in a way which may rupture it or cause leaks? (265.173(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
j) ignitable & reactive wastes stored 15 meters (50 feet) from property line or written approval obtained from local fire prevention code authority for less than 15 meter? (265.176)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
k) are containers inspected weekly for leaks and defects? (265.174)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
l) did the generator document the inspections in 32(k)? (Rule 306(1)(a)(i))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
m) inspection documents maintained on-site 3 years? (Rule 306(1)(a)(i)) <i>Jim Wenzel</i>	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
n) are incompatible wastes stored in separate containers? (265.177(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
o) hazardous wastes put in unwashed containers that previously held incompatible waste. (265.177(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
p) incompatible waste separated/protected from each other by physical barriers or sufficient distance? (265.177(c))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(2) & 40 CFR 262.34(c)(1)(i) both refer to 40 CFR 265.171, 265.172 & 265.173(a).

33. If hazardous waste is being accumulated at the point of generation:		
a) container(s) <55 gal or 1 qt acutely/severely toxic? (Rule 306(2):40 CFR 262.34(c)(1))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) container(s) under operator control & near the point of generation? (Rule 306(2): 40 CFR 262.34(c)(1))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) container(s) have words "Hazardous Waste"? (Rule 306(2): 40 CFR 262.34(c)(1)(ii))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d) are the container(s) marked with the hazardous waste number or chemical name? (Rule 306(2))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
e) are container(s) in good condition? (265.171)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
f) are container(s) compatible with waste in them? (265.172)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
g) container(s) closed when not in use & managed to prevent leaks? (265.173(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
34. If generator exceeds 55 gallons or 1 quart, w/in 3 days does generator, w/respect to that amount of excess waste:		
a) mark the container with the date the excess amount began accumulating? (Rule 306(2): 40 CFR 262.34(c)(2))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) move to an area with secondary containment, if required? (Rule 306(1): 40 CFR 264.175))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(a) refers to containment requirements in 40 CFR 264.175.

35. If accumulating free liquids or any F020, F021, F022, F023, F026, F027, does the hazardous waste storage area include		
a) impervious base free of cracks? (264.175(b)(1)) :	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

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YES NO

b) sloped or otherwise designed to elevate/protect containers from contact with liquids? (264.175(b)(2))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) hold 10% of volume of containers or volume of the largest container, whichever is greater? (264.175(b)(3))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d) run-on prevented unless sufficient capacity? (264.175(b)(4))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
e) accumulated liquids removed in a timely manner to prevent overflow? (264.175(b)(5))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

NOTE: Closure of Accumulation Area covered under # 53.

36. If accumulating solids, (other than F020, F021, F022, F023, F026, F027), is haz waste accumulation area sloped or otherwise designed, or containers elevated or otherwise protected from contact with liquids? (264.175(c)(1 & 2))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
37. Is hazardous waste accumulated in other than tanks or containers? Or, is hazardous waste generated but not accumulated, i.e.: process tank? <i>2002 process tank Explain any yes answer. removed when closed</i>		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
38. Waste area protected from weather, fire, physical damage & vandals? (Rule 306(1)(e))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
39. Hazardous waste accumulated so no hazardous waste or hazardous waste constituent can escape by gravity into soil, directly or indirectly, into surface, ground-waters, drains or sewers, and such that fugitive emissions do not violate Act 451, Part 55? (Rule 306(1)(f))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
40. Is hazardous waste accumulated in tanks? <i>If so, complete Tank System inspection form.</i>		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
41. Is hazardous waste placed on drip pads? <i>If so, complete Wood Preserving inspection form</i>		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refers to 265.16
PERSONNEL TRAINING (265.16)

Jim Wenzel

42. Did personnel receive training? (265.16)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
43. Do personnel training records contain the following:		
a) job title? (265.16(d)(1))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) job descriptions? (265.16(d)(2))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) name of employee filling each job? (265.16(d)(1))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d) description of type & amount of both introductory & continued training? 265.16(d)(3))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
e) training designed so facility personnel can respond to emergencies? (265.16(a)(3))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
f) records of training? (265.16(d)(4))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
g) do new personnel receive required training within 6 months? (265.16(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
h) do training records show personnel have taken part in annual training? (265.16(c))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
i) training by person trained in hazardous waste management procedures? (265.16(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to 265, Subpart C, 265.30-265.37.
PREPAREDNESS AND PREVENTION (265.30-265.37)

44. Facility maintained/operated to minimize possibility of fire, explosion, release of hazardous waste or hazardous waste constituent which could threaten human health/environment? (265.31)	262C	co.said_obsrved <input type="checkbox"/> <input type="checkbox"/> NI N/A
45. If required, does this facility have the following:		
a) internal communications or alarm systems? (265.32(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) telephone or 2-way radios at the scene of operations? (265.32(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) portable fire extinguishers, fire control, spill control equipment and decontamination equipment? (265.32(c))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) adequate volume of water and/or foam available for fire control? (265.32(d))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
46. Testing and Maintenance of Emergency Equipment		
a) owner/operator test & maintain emergency equipment to assure operation? (265.33)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) has owner/operator provided immediate access to internal alarms? Access to alarm system is applicable only if required (40 CFR 265.32)		
i) when hazardous waste is being poured, mixed, etc. (265.34(a))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
ii) if only one employee on the premises while facility is operating. (265.34(b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
c) aisle space for unobstructed movement of personnel/emergency equipment? (265.35)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
47. Has the facility made arrangements with local authorities? (265.37(a)&(b)) <i>no green card</i>	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(d) & 40 CFR 262.34(a)(4) refer to Subpart D, 265.50-265.56.
CONTINGENCY PLAN AND EMERGENCY PROCEDURES (265.50-265.56)

48. Plan implemented whenever fire/explosion/release could threaten human health or the environment? (265.51(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI <input checked="" type="checkbox"/> N/A
49. Does the contingency plan contain the following:		
a) actions personnel must take responding to fires/explosions/unplanned release of hazardous waste? (265.52(a & b))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) describe arrangements w/ local police, fire, hospitals, contractors, state & local emergency responders for emergency services; (265.52(c)) & (265.37(a)&(b))?	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

SPCC to be updated YES NO

c) name, addresses & phone (office & home) of emergency coordinator? (265.52)(d))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
d) list emergency equipment at the facility, including location, physical description & capabilities? (265.52(e))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
e) evacuation plan for personnel w/ signal(s), evacuation routes & alternate evacuation routes. (265.52(f))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
50. Does the facility have an Emergency Coordinator? (265.55)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
Emergency Coordinator and Emergency Procedures:		
a) emergency coordinator familiar with site operation & emergency procedures? (265.55)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) emergency coordinator has the authority to carry out the contingency plan? (265.55)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c) if emergency occurred, did the emergency coordinator follow emergency procedures? (265.56)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d) fire/explosion/other release of hazardous waste/haz. waste constituents, could threaten human health or environment or generator has knowledge spill reached surface or ground water, did generator notify MDEQ? (Rule 306(1)(d))	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
51. Contingency plan Amendments and Copies		
a) amended: fails in emergency; changes in regulations/emergency coordinators/emergency equipment? (265.54)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) copies of plan on site and sent to local emergency organizations? (265.53)	262C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 309 refers to 262, Subpart E except 262.54 & 262.55
INTERNATIONAL SHIPMENTS (Rule 309 & 310: 40 CFR 262.50-262.60)

52. Has the facility imported or exported hazardous waste?		<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
a) exporting, has the generator:		
i) notified the Administrator in writing <12 months prior to shipment? (Rule 309(1): 40 CFR 262.53(a))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
ii) receiving country consented to accept waste. (Rule 309(1): 40 CFR 262.52(b))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iii) has copy of EPA Acknowledgment of Consent. (Rule 309(1): 40 CFR 262.52(c))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
iv) complied with manifest requirements in Rule 309(2)(a-i).	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
v) if required, was an exception report filled. (309(3)(a-c))	262E	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b) importing, has the generator met manifest requirements? (Rule 310: 40 CFR 262.60)	262F	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Rule 306(1)(g) and 40 CFR 262.34(a)(1) refers to 40 CFR 265.111 & 265.114
ACCUMULATION AREA CLOSURE (265.111 & 265.114)

53. The accumulation area must be closed in a manner that:		
a) minimizes need for further maintenance (Rule 306(1)(g): 40 CFR 265.111(a))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
b) controls/minimizes/eliminates, to protect human health & environment, the escape of haz. waste or hazardous waste constituents, leachate, run-off to ground/surface waters and air. (Rule 306(1)(g): 40 CFR 265.111(b))	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A
c) all contaminated equipment, structures, and soil properly disposed of. (Rule 306(1)(g): 40 CFR 265.114)	262C	<input checked="" type="checkbox"/> <input type="checkbox"/> NI N/A

COMMENTS:

21. only MSDS. no analyses

C-8 (blank)

Department of Natural Resources & Environment
UNIVERSAL WASTE LARGE QUANTITY HANDLER
(LQH) INSPECTION

*really SQH,
not LQH.*

Facility Name ROUSHENTER PRICES

Part 2 Rules

Date 8/31/2012

I.D. # MID 094 555 299

1994 PA 451

LQH may choose to manage the following as universal waste when they accumulate quantities of 5000 kg (11,000 lbs) or more of all these wastes on site: **antifreeze; batteries [except lead acid batteries managed per R 299.9804]; consumer electronics (devices containing circuit boards, liquid crystal display, or plasma display); electric lamps [fluorescent, high intensity discharge (HID), sodium vapor, mercury vapor, neon, metal halide, incandescent lamps, and cathode ray tubes (CRTs) from computers, televisions, etc.]; mercury items: thermostats, mercury switches, mercury thermometers, waste devices containing only elemental mercury; various pesticides; pharmaceuticals.**

Yes/No responses that are outside of the parenthesis are violations.
 (NI - Not Inspected N/A - Not Applicable)

PROHIBITIONS (Rule 228(5): 40 CFR 273.31)

YES NO

1. Does LQH dispose of universal waste? (Rule 228(5): 40 CFR 273.31(a))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
2. Does LQH dilute or treat universal waste, except responding to releases or managing certain waste when included below? (Rule 228(5): 40 CFR 273.31(b))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

NOTIFICATION (Rule 228(5): 40 CFR 273.32)

only applies to LQHT

3. Did LQH notify DEQ of activities using form EQP5150 and did handler receive site identification number (before exceeding 5000 kg)? (Rule 228(5): 40 CFR 273.32(a)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
4. Did handler maintain the LQG designation to end of the calendar year? (Rule 228(5)(a): 40 CFR 273.32)	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

WASTE MANAGEMENT (Rule 228(5): 40 CFR 273.33)

ANTIFREEZE: (Rule 228(5) (h) adopts Rule 228(4)(h))

QTY HANDLED:

Ø Bldg 28

5. Is antifreeze managed in manner to prevent release by containing it in structurally sound packaging that is compatible w/ contents, & kept closed? Are transport vehicles & vessels managed in the same way? (Rule 228(4)(h))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
6. Do containers show evidence of leakage, spillage, or damage? If so, are these containers over packed in a container that meets requirements? (Rule 228(4)(h)(ii)(B))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
7. If tanks are used to store antifreeze, do they meet requirements in 40 CFR 265 Subpart J except 265.197(c), 265.200, & 265.201? (Rule 228(4) (h) (ii) (C). [USE TANK CHECKLIST])	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
8. Are containers labeled "UNIVERSAL WASTE ANTIFREEZE" or "WASTE ANTIFREEZE" or "USED ANTIFREEZE"? (Rule 228(4)(h)(iv))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
9. If a release occurred, was it immediately cleaned up & properly characterized for disposal? (Rule 228(4)(e)(ii))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

BATTERIES: (Rule 228(5) adopts 40 CFR 273.33(a) requirements)

QTY HANDLED:

Ø Bldg 28

10. Are batteries managed in way to prevent releases? (Rule 228(5): 40 CFR 273.33(a)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
11. Are batteries that show evidence of leakage, spillage, or damage that could cause leaks put in containers that are kept closed, structurally sound, compatible w/ contents of battery, & lack evidence of leakage, spillage or damage that could cause leakage? (Rule 228(5): 40 CFR 273.33(a)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
12. Does the handler do any of the following w/ batteries as long as casings of batteries are not breached & remain intact & closed (except to remove electrolyte): sort by type, mix types in container, discharge to remove electric charge, regenerate, disassemble into individual batteries or cells, remove from consumer products, or remove electrolyte? (Rule 228(5): 40 CFR 273.33(a)(2))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
13. If electrolyte is removed or other wastes generated from activities in item 10, has it been determined whether it is hazardous waste? (Rule 228(5): 40 CFR 273.33(a)(3))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
a. If electrolyte or other waste is hazardous waste, is it managed in compliance with Parts 260-272 and Part 111? (Rule 228(5): 40 CFR 273.33(a)(3)(i))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. If electrolyte or other waste is not hazardous waste, is it managed in compliance with Parts 31, 115 or 121 of 451 & local requirements? (Rule 228(5): 40 CFR 273.33(a)(3)(ii))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
14. Are batteries or container(s) of batteries labeled w/ either: "UNIVERSAL WASTE-BATTERIES" or "WASTE BATTERIES" or "USED BATTERIES". (Rule 228(5): 40 CFR 273.34(a))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

Telecom IT Group in a Bldg. equipment leased
CONSUMER ELECTRONICS: (Rule 228(5) (g) adopts 228(4) (f) & (g))

QTY HANDLED:

Ø Bldg 28

15. Are electronics managed in a manner that prevents breakage or release of any universal waste or components of universal waste by containing electronics in packaging that will prevent breakage during normal handling conditions? (Rule 228(4)(f)(i))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
16. Is packaging in which the electronics are contained labeled either "UNIVERSAL WASTE CONSUMER ELECTRONICS" or "UNIVERSAL WASTE ELECTRONICS"? (Rule 228(4)(f)(ii))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
17. Have releases been properly contained, & have residues been characterized, & properly disposed? (Rule 228(4)(f)(iii))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

4 years ago ago, fixtures changed & green bulbs installed

18. Does the handler do anything beyond any of the following with the electronics: Repair electronics for potential direct reuse (Rule 228(4)(g)(i)); Remove other universal wastes from consumer electronics (Rule 228(4)(g)(ii)); Remove modular components for direct reuse (Rule 228(4) (g) (iii))?	273.C	<input type="checkbox"/> NI N/A
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ELECTRIC LAMPS: (Rule 228(5) (d) adopts 228(4) (c))

QTY HANDLED:

19. Are lamps crushed or broken and facility trying to manage as universal waste? (universal waste electric lamps shall not be crushed or broken under MI rule) (Rule 228(4)(c)(ii)) <i>Note: different from EPA regulation</i>	273.C	<input type="checkbox"/> NI N/A
20. Are lamps managed in a manner to prevent breakage or the release of any universal waste or components of universal waste by containing unbroken lamps in structurally sound packaging that is compatible with contents of lamps and will prevent breakage, and packaging kept closed? (Rule 228(5)(d))	273.C	<input type="checkbox"/> NI N/A
21. Are lamps or packaging containing lamps labeled either "UNIVERSAL WASTE ELECTRIC LAMP(S)" or "WASTE ELECTRIC LAMP(S)" or "USED ELECTRIC LAMP(S)". (Rule 228(5)(d)) <i>Note: different from EPA regulation</i>	273.C	<input type="checkbox"/> NI N/A
22. Are lamp fragments or residues, & all lamps that show evidence of breakage, leakage, or damage that could cause release of mercury or other hazardous constituents to the environment immediately contained in packaging that is structurally sound & compatible w/ content, & kept closed? (Rule 228(5)(d)) <i>Note: different from EPA regulation</i>	273.C	<input type="checkbox"/> NI N/A
23. If lamp fragments or residues are generated, has it been determined whether it is hazardous waste? (Rule 228(5)(d)) <i>Note: different from EPA regulation which allows broken lamps to continue to be managed as universal waste</i>	273.C	<input type="checkbox"/> NI N/A
a. If waste is characteristic is it managed in compliance w/ Part 111, Act 451: 40 CFR Part 260-272? (228(5)(d))	273.C	<input type="checkbox"/> NI N/A
b. If waste is not characteristic is it managed in compliance w/ Part 115 of Act 451? (228(5)(d))	273.C	<input type="checkbox"/> NI N/A

also will pickup 44.

MERCURY DEVICES: (Rule 228(5) (e) adopts 40 CFR 273.33(c))

QTY HANDLED:

24. Are devices managed to prevent releases? (Rule 228 (5)(e): 40 CFR 273.33(c))	273.C	<input type="checkbox"/> NI N/A
25. Are mercury devices that show evidence of leakage, spillage, or damage that could cause leaks placed in a container that is closed, structurally sound, compatible w/ contents of device, & lack evidence of leakage, spillage or damage that could cause leakage, & designed to prevent the escape of mercury by volatilization or other means? (Rule 228 (5)(e): 40 CFR 273.33(c)(1))	273.C	<input type="checkbox"/> NI N/A
26. Are mercury devices or containers of mercury devices labeled either "UNIVERSAL WASTE THERMOSTAT(S)" or "WASTE MERCURY THERMOSTAT(S)" or "USED MERCURY THERMOSTAT(S)". (Rule 228 (5)(e): 40 CFR 273.34(d))	273.C	<input type="checkbox"/> NI N/A
27. Does handler removing ampules meet the following conditions?		
a. Does facility try to prevent breakage and is doing removal only over a containment device? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(i & ii))	273.C	<input type="checkbox"/> NI N/A
b. Does facility have a clean-up system available to transfer spilled material to another container & use it immediately w/ broken or leaking ampules? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(iii & iv))	273.C	<input type="checkbox"/> NI N/A
c. Is facility area well ventilated & monitored to ensure compliance w/ OSHA exposure limits? (Rule 228 (5)(e): 40 CFR 273.33(c)(2) (v))	273.C	<input type="checkbox"/> NI N/A
d. Does facility have employees familiar w/ proper waste handling & emergency procedures? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vi))	273.C	<input type="checkbox"/> NI N/A
e. Are removed ampules stored in closed, non-leaking container that is in good condition? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vi))	273.C	<input type="checkbox"/> NI N/A
f. Are removed ampules packed in container with packing material to prevent breakage? (Rule 228 (5)(e): 40 CFR 273.33(c)(2)(vii))	273.C	<input type="checkbox"/> NI N/A
28. When devices do not contain ampules & handler removes original housings that hold mercury, does handler immediately seal original housing to prevent mercury release & follow all ampule management requirements? (Rule 228 (5)(e): 40 CFR 273.33(c)(3))	273.C	<input type="checkbox"/> NI N/A
29. If waste is generated from removal of ampules or housings, or if clean-up residues are generated, is it determined if it is hazardous waste? (Rule 228 (5)(e): 40 CFR 273.33(c)(3)(i))	273.C	<input type="checkbox"/> NI N/A
a. If waste is characteristic, is it managed in compliance w/ part 260-272 and Part 111? (Rule 228 (5)(e): 40 CFR 273.33(c)(3)(ii))	273.C	<input type="checkbox"/> NI N/A
b. If waste is not hazardous waste, is it managed in compliance w/ Parts 115 & 121 of Act 451, as applicable? Rule 228 (5)(e): 40 CFR 273.33(c)(3)(iii))	273.C	<input type="checkbox"/> NI N/A

PESTICIDES: Rule 228(5) (b) adopts 40 CFR 273.33(b) and 273.34)

QTY HANDLED:

30. Handler prevents releases by containing pesticides in containers that are closed, structurally sound & compatible w/ pesticide, & does not show evidence of leakage, spillage or damage? (Rule 228(5)(b): 40 CFR 273.33(b)(1))	273.C	<input type="checkbox"/> NI N/A
31. If original container is in poor condition, is it over-packed in acceptable container? (Rule 228(5)(b): 40 CFR 273.33(b)(2))	273.C	<input type="checkbox"/> NI N/A
32. If stored in tank, are requirements of 40 CFR Part 265, Subpart J met except 265.197(c), 265.200, & 265.201? [USE TANK CHECKLIST] (Rule 228(5)(b): 40 CFR 273.33(b)(3))	273.C	<input type="checkbox"/> NI N/A
33. If stored in transport vehicle or vessel, is it closed, structurally sound & compatible w/ pesticides & shows no evidence of leakage, spillage or damage?? (Rule 228(5)(b): 40 CFR 273.33(b)(4))	273.C	<input type="checkbox"/> NI N/A
34. Are pesticides in a container, tank or transport vehicle labeled either "UNIVERSAL WASTE-PESTICIDE(s)" or "WASTE-PESTICIDE(s)" (Rule 228(5)(b): 40 CFR 273.34(b)(1 & 2) & (c)(1 & 2)) [See 273.14(c) if 273.34(b) not possible]	273.C	<input type="checkbox"/> NI N/A

PHARMACEUTICALS: (Rule 228(5) (f) adopts 228(4) (e))**QTY HANDLED:**

35. Are pharmaceuticals managed in a manner to prevent release of any universal waste or components of universal waste by containing pharmaceuticals in structurally sound packaging that is compatible w/ contents & will prevent breakage, & kept closed? Are containers that do not meet these conditions over packed in a container that does? (Rule 228(4)(e)(i))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
36. Does handler disassemble packaging & sort pharmaceuticals? (Rule 228(4)(e)(iii))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
37. Are incompatible pharmaceuticals segregated & adequate distance maintained to prevent contact w/ incompatible materials? (Rule 228(4)(e)(iv))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
38. If a release occurred, was it immediately cleaned up and properly characterized for disposal? (Rule 228(4) (e) (ii))?	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

ACCUMULATION TIME LIMITS (Rule 228(5): 40 CFR 273.35)

39. Is universal waste accumulated one year or less? (Rule 228(5): 40 CFR 273.35(a)) OR (if no go to question 40)	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
40. If accumulated over one year, is accumulation necessary to facilitate proper recovery, treatment or disposal (burden on handler to demonstrate)? (Rule 228(5): 40 CFR 273.35(b))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
41. Is length of time universal wastes stored documented by one of the following:		
a. container marked or labeled w/ earliest date when universal waste became a waste? (Rule 228(5): 40 CFR 273.35(c)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. individual items of universal waste marked or labeled w/ earliest date it became a waste?? (Rule 228(5): 40 CFR: 273.35(c)(2))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c. inventory system maintained on-site that identifies date each item became a universal waste? (Rule 228(5): 40 CFR 273.35(c)(3))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
d. inventory system maintained on-site that identifies earliest date items in a group or group of containers became a universal waste? (Rule 228(5): 40 CFR (273.35(c)(4))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
e. universal waste placed in a specific accumulation area & the earliest date is identified when waste was first put in area or date received? (Rule 228(5): 40 CFR (273.35(c)(5))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
f. any other method when demonstrates length of time universal waste accumulated & date it became a waste or received? (Rule 228(5): 40 CFR (273.35(c)(6))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

EMPLOYEE TRAINING (Rule 228(5): 40 CFR 273.36)

42. Are employees familiar w/ universal waste handling/emergency procedures, relative to their responsibilities? (Rule 228(5): 40 CFR 273.36))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
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RESPONSE TO RELEASE (Rule 228(5): 40 CFR 273.37)

43. Are releases of universal waste & other residue immediately contained? (Rule 228(5): 40 CFR 273.37(a))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
44. Is material from release characterized? (Rule 228(5): 40 CFR 273.37(b))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
45. If released material is hazardous waste is it managed as required under Parts 260 – 271 and Part 111? (Rule 228(5): 40 CFR 273.37(b))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

OFF-SITE SHIPMENTS (Rule 228(5): 40 CFR 273.38 except 273.38(b))*none in past 3 years*

46. Is waste sent to another handler, destination facility or foreign destination? (Rule 228(5): 273.38(a))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
47. If the LQH self-transport waste, does it comply with the universal waste transporter requirements? (Rule 228(5)(c): 40 CFR 273.38(b))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
48. If waste is a USDOT hazardous material, are USDOT requirements met w/regard to package/labels/ marking/placards/shipping papers? (Rule 228(5): 273.38(c))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
49. Prior to shipping universal waste off-site did receiver agree to receive shipment? (Rule 228(5): 40CFR 273.38(d))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
50. If universal waste shipped off-site is rejected by other handler or destination facility, did originating handler either:		
a. receive the waste back? (Rule 228(5): 40 CFR 273.38(e)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. agree to where shipment will be sent? (Rule 228(5): 40 CFR 273.38(e)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
51. If handler rejects part or full load from another handler, did receiving handler contact originating handler & discuss either:		
a. sending the waste back to originating handler? : (Rule 228(5): 40 CFR 273.38(f)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. agreeing to where shipment will be sent? (Rule 228(5): 40 CFR 273.38(f)(2))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
52. If handler received shipment of hazardous waste that is not universal waste, was the WHMD District Supervisor or designee immediately notified? (Rule 228(5)(b)):40 CFR 273.38(g))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
53. If handler received a shipment of non-hazardous, non-universal waste, was the waste managed in accordance w/ applicable waste regulations (e.g. solid, liquid industrial, or medical waste)? (Rule 228(5): 40 CFR 273.38(h))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

TRACKING UNIVERSAL WASTE SHIPMENTS (Rule 228(5): 40 CFR 273.39)*only applies to LQH*

54. Is there a record of each shipment when universal waste is received from another handler? (Rule 228(5) 40 CFR 273.39(a))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
55. Does the record include:		
a. name & address of originating handler or foreign shipper? (Rule 228(5): 40 CFR 273.39(a)(1))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(a)(2))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A
c. date received? (Rule 228(5): 40 CFR 273.39(a)(3))	273.C	<input type="checkbox"/> <input type="checkbox"/> NI N/A

56. Is there a record of each shipment of universal waste shipped to another handler? (Rule 228(5): 40 CFR 273.39(b))	273.C	<input type="checkbox"/> NI N/A
57. Does the record include:		
a. the name & address of the universal waste handler, designation facility or foreign destination? (Rule 228(5): 40 CFR 273.39 (b)(1))	273.C	<input type="checkbox"/> NI N/A
b. quantity of each type of universal waste? (Rule 228(5): 40 CFR 273.39(b)(2))	273.C	<input type="checkbox"/> NI N/A
c. date shipped? (Rule 228(5): 40 CFR 273.39(b)(3))	273.C	<input type="checkbox"/> NI N/A
58. Are records kept at least for 3 years? (Rule 228(5): 40 CFR 273.39(c)(1&2))	273.C	<input type="checkbox"/> NI N/A

EXPORTS (Rule 228(5): 40 CFR 273.40)

59. If waste is sent to a foreign destination does handler:		
a. comply with primary exporter requirements in 40 CFR 262.53, 262.56(a)(1-4 &6) and(b) and 262.57? (Rule 228(5): 40 CFR 273.40(a))	273.C	<input type="checkbox"/> NI N/A
b. export with consent of receiving country and in compliance with Acknowledgment of Consent, Subpart E, 40 CFR 262? (Rule 228(5): 40 CFR 273.40(b))	273.C	<input type="checkbox"/> NI N/A
c. provide copy of EPA Acknowledgement of Consent to transporter? (Rule 228(5): 40 CFR 273.40(c))	273.C	<input type="checkbox"/> NI N/A

TRANSPORTER (Rule 228(6): 40 CFR 273 subpart D except 273.50, 53)

*probably yes, doesn't
keep
of any
in
past
4 years*

60. Does transporter dispose of universal waste? (Rule 228(6): 40 CFR 273.51(a))	273.D	<input type="checkbox"/> NI N/A
61. Does transporter dilute or treat universal waste, except if responding to releases? (Rule 228(6): 40 CFR 273.51(b))	273.D	<input type="checkbox"/> NI N/A
62. If transporting responds to release, do they immediately contain it and characterize residue? If hazardous waste, does transporter meet requirements in 40 CFR 262? (Rule 228(6): 40 CFR 273.54))	273.D	<input type="checkbox"/> NI N/A
63. If universal waste stored at transfer facility over 10 days, does transporter meet applicable handler requirements? (Rule 228(6): 40 CFR 273.54))	273.D	<input type="checkbox"/> NI N/A
64. Does transporter comply w/ USDOT requirements for package/labels/markings/placards/shipping papers if universal waste is also hazardous material? Shipping papers cannot describe universal waste as "hazardous waste, (l) or (s), n.o.s." nor have waste added to USDOT proper shipping name. (Rule 228(6)(a): 40 CFR 273.52 and 273.55(b))	273.D	<input type="checkbox"/> NI N/A
65. Does transporter meet export conditions contained in 273.56 (dependent on which country will receive shipment)? (Rule 228(6): 40 CFR 273.56)	273.D	<input type="checkbox"/> NI N/A
b. has a copy of EPA Acknowledgement of Consent with shipment? (Rule 228(6): 40 CFR 273.56(a))	273.D	<input type="checkbox"/> NI N/A
c. delivers shipment to facility designated by person initiating the shipment? (Rule 228(6): 40 CFR 273.56(b))	273.D	<input type="checkbox"/> NI N/A

COMMENTS:

*probably Clean Lights managed
some name confusion Clean Lights or Green Lights*

ATTACHMENT D
Document(s) Copied

Mark R. Gomez

From: Keller, Shannon [keller.shannon@cleanharbors.com]
Sent: Friday, August 31, 2012 10:47 AM
To: Mark R. Gomez
Cc: Castro, Trina
Subject: FW: EPA - LDR Question

Mark,

Please see explanation below. Let us know if you have any further questions. Thank you.

Shannon Keller
Clean Harbors Environmental Services
Account Manager
keller.shannon@cleanharbors.com
office/cell 313-549-8463

From: Wright, April D
Sent: Friday, August 31, 2012 10:29 AM
To: Keller, Shannon; Castro, Trina
Subject: RE: EPA - LDR Question

I received clarification from Jay.

Since this includes the D001 for non-wastewaters being treated by CMBST, (incineration or fuel) or RORGS- (distillation/solvent recovery), UHCs are not required to be identified on the LDR.

The F listed solvents fall under the constituents of concern which is why they are checked yes.

The constituents subject to treatment category is only for those wastes shipping under an alternate standard, i.e. alternate debris standard, alternate soil standard, etc. Typically streams we would see for landfill.

Thanks

April Wright
Central Profile Representative
Clean Harbors Environmental Services
42 Longwater Dr.
Norwell, MA 02061-9149
Office: 781-792-5425
Fax: 781-792-1097
Email: wright.april@cleanharbors.com
Web: www.cleanharbors.com

-----Original Message-----

From: Keller, Shannon
Sent: Friday, August 31, 2012 9:28 AM

To: Castro, Trina; Wright, April D; CPGW
Subject: RE: EPA - LDR Question

profile CH235257

Shannon Keller
Clean Harbors Environmental Services
Account Manager
keller.shannon@cleanharbors.com
office/cell 313-549-8463

-----Original Message-----

From: Castro, Trina
Sent: Thursday, August 30, 2012 5:13 PM
To: Wright, April D; CPGW
Cc: Keller, Shannon
Subject: Re: EPA - LDR Question

Was it attached

----- Original Message -----

From: Wright, April D
Sent: Thursday, August 30, 2012 05:00 PM
To: Castro, Trina; CPGW
Cc: Keller, Shannon
Subject: RE: EPA - LDR Question

What is the profile number?

April Wright
Central Profile Representative
Clean Harbors Environmental Services
42 Longwater Dr.
Norwell, MA 02061-9149
Office: 781-792-5425
Fax: 781-792-1097
Email: wright.april@cleanharbors.com
Web: www.cleanharbors.com

-----Original Message-----

From: Castro, Trina
Sent: Thursday, August 30, 2012 4:31 PM
To: CPGW
Cc: Keller, Shannon

Subject: FW: EPA - LDR Question

Importance: High

CPG,

Please advise.

I don't see any underlying haz constituents listed on the profile thus the "N" but if you could give your professional opinion we would appreciate it. thank you

-----Original Message-----

From: Mark R. Gomez [mailto:mark.gomez@roush.com]

Sent: Wednesday, August 29, 2012 5:07 PM

To: Keller, Shannon

Subject: FW: EPA - LDR Question

Importance: High

Shannon,

Inspector from EPA wants to know why the column "Underlying Hazardous Constituents" and "Contaminants Subject to Treatment" are marked "N".

I need this reply by early Friday 8/31 am. She will be back.

Thank you!

Mark R. Gomez

EH&S Coordinator

Roush Industries

Desk: 734-779-7266

Cell: 248-760-3577

Fax: 734-779-7919

-----Original Message-----

From: multidevice@roush.com [mailto:multidevice@roush.com]

Sent: Wednesday, August 29, 2012 5:04 PM

To: Mark R. Gomez

Subject: Scanned from B07 Facilities

Please open the attached document. It was scanned and sent to you using a Xerox multifunction device.

Sent by: Guest

Attachment File Type: pdf

multifunction device Location: machine location not set

Device Name: XRX_9C934E03BC3B

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GE Consumer & Industrial Lighting

1975 Noble Road
Nela Park
Cleveland, OH 44112
(216) 266-9729

Certificate of Analysis

Reporting Analytical Lab

Alpha Analytical Labs
Westborough, MA 01581-1019

DATE: October 2002

DESCRIPTION: T8 GE Ecolux Fluorescent Lamps

MODEL: F32T8/SPX50/ECO

Test

Toxicity Characteristic Leaching Procedure (TCLP)
for Mercury EPA Method 1311 of Test Methods for Evaluating Solid Waste
Physical/Chemical Methods, SW-846

Tested in accordance with NEMA Standard, NEMA LL 1,
"Procedures for Linear Fluorescent Lamp Sample Preparation and the TCLP."

TCLP Maximum Allowable Concentration for Mercury

- 0.200 mg/Liter (USA)
 - 0.100 mg/Liter (Canada)
-

NUMBER OF LAMPS: 10

Result Summary

Average Result: **0.023 mg/Liter**

Standard Deviation: **0.015**

90% Confidence Limit: **0.031 mg/Liter**

TCLP RESULT: **PASSED – USA & CANADA**



GE Consumer & Industrial Lighting

Lamp Material Information Sheet

Material Safety Data Sheets (MSDS) Information and Applicability

The Material Safety Data Sheet (MSDS) requirements of the Occupational Safety and Health Administration (OSHA) for chemicals are not applicable to manufactured articles such as lamps. No material contained in a lamp is released during normal use and operation.

The following information is provided as a service to our customers. The following Lamp Material Information Sheet contains applicable Material Safety Data Sheet information.

I. Product Identification

GE Ecolux® Fluorescent Lamps

GE Consumer & Industrial Lighting

1975 Noble Road
Nela Park
Cleveland, OH 44112
(216) 266-2222

II. Lamp Materials and Hazardous Ingredients

Glass & Metal

The glass tube used in this fluorescent lamp is manufactured from soda-lime glass and is essentially similar but not identical to that used throughout the glass industry for bottles and other common consumer items. The end-caps on the lamp are generally aluminum while the wires in the lamps (called filaments or cathodes) are made of tungsten.

Phosphor

The Ecolux product line uses two different phosphor systems. One phosphor system (halophosphate) uses calcium chloro-fluoro-phosphate, with small amounts (less than 1-2% by weight the phosphor) of antimony and manganese, both of which are tightly bound in the phosphor matrix. The second phosphor system (SP/SPX) uses a mixture of rare earth elements such as lanthanum, and yttrium as either an oxide or as a phosphate, along with a barium/aluminum oxide. These phosphors produce better lamp efficiency and color rendition. The phosphor components may vary slightly depending on the color of the lamp (cool white, warm white, etc.).

Mercury

While mercury is present in small amounts in all fluorescent lamps, the Ecolux lamp uses the lowest amount of mercury of any GE Lighting lamp of the same type. The amount of mercury present in any

given lamp will vary slightly, but the target dose for Ecolux is over 85% less than the average for traditional fluorescent lamp designs of the same type. The average target dose for the F40T12 Ecolux lamp and the F32T8 Ecolux lamp is very low and optimized to balance performance requirements with environmental concerns..

Metals

Internally, the support wires used in the lamp construction are made from nickel-coated iron, stainless steel, molybdenum, or niobium, while the electrodes are tungsten. Many of the ceramic metal halide types will use a brass base and have lead-soldered connections to that base.

III. Health Concerns

Phosphor

Except for small modifications, the halophosphor is essentially the same material that has been in use in GE lamps for over fifty years. The Industrial Hygiene Foundation of the Mellon Institute found no significant adverse effects, either by ingestion, inhalation, skin contact, or eye implant, in a five-year animal study of the original phosphor. Also, there have been no significant adverse effects on humans by any of these routes during the many years of its manufacture or use. The phosphor is somewhat similar to the inert mineral apatites (calcium phosphate-fluorides) that occur in nature. Antimony, manganese, yttrium and barium compounds are characterized by OSHA as hazardous chemicals, as are most inorganic compounds. However, due to their insolubility, relatively low toxicity and small amount present in the phosphor and the lamp, these materials do not present a significant hazard in the event of breakage of the lamp.

Mercury

Neither the mercury nor the phosphor concentration in air produced as a result of breaking one or a small number of fluorescent lamps would result in significant exposure levels. However, when breaking a large number of lamps for disposal, appropriate industrial hygiene monitoring and controls should be used to minimize airborne levels or surface contamination. Such work must be done in a well-ventilated area. Local exhaust ventilation and personal protective equipment such as respirators may be needed.

IV. Disposal Concerns

TCLP

Ecolux fluorescent lamps consistently pass the EPA Toxicity Characteristic Leaching Procedure¹ for mercury by significant margin. Therefore, federal EPA does not classify Ecolux lamps as hazardous waste.

Ecolux TCLP test results are available at www.gelighting.com.

While Ecolux lamps will pass the federal EPA TCLP test, state and/or local regulations may still regulate the disposal of mercury-containing products. To check state regulations or to locate a recycler, go to www.lamprecycle.org.



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Products > 42064

42064 - F32T8/SPX50/ECO

GE Ecolux® Starcoat® T8

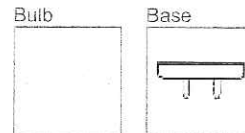
PRINT

- Passes TCLP, which can lower disposal costs.

High Color Rendering

GENERAL CHARACTERISTICS

Lamp type	Linear Fluorescent - Straight Linear
Bulb	T8
Base	Medium Bi-Pin (G13)
Wattage	32
Voltage	137
Rated Life	20000 hrs
Rated Life (instant start) @ Time	20000 h @ 3 h 24000 h @ 12 h
Rated Life (rapid start) @ Time	24000 h @ 12 h
Bulb Material	Soda lime
Starting Temperature (MIN)	10 °F (-12 °C)
Picograms of Mercury	74 picograms
Additional Info	TCLP compliant



View Larger

ADDITIONAL RESOURCES

Catalogs

Testimonials

Brochures

Product Brochures

- Ecolux
 - Linear Fluorescent Lamps
 - Ecolux (Environmental)
- Application/Segment Brochures
- Retail Lighting
 - Office Lighting
 - Healthcare Lighting
 - Contractor Lighting

MSDS (Material Safety Data Sheets)

Disposal Policies & Recycling Information

PHOTOMETRIC CHARACTERISTICS

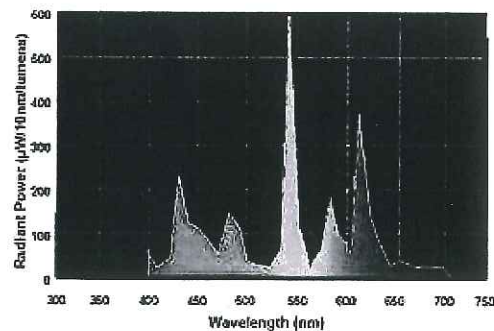
Initial Lumens	2800
Mean Lumens	2660
Nominal Initial Lumens per Watt	87
Color Temperature	5000 K
Color Rendering Index (CRI)	86

ELECTRICAL CHARACTERISTICS

Open Circuit Voltage (rapid start) Min @ Temperature	315 V @ 10 °C
Cathode Resistance Ratio - Rh/Rc (MIN)	4.25
Cathode Resistance Ratio - Rh/Rc (MAX)	6.5
Current Crest Factor (MAX)	1.7

DIMENSIONS

Maximum Overall Length (MOL)	47.7800 in (1213.6 mm)
Minimum Overall Length	47.6700 in (1210.8 mm)
Nominal Length	48.000 in (1219.2 mm)
Bulb Diameter (DIA)	1.000 in (25.4 mm)
Bulb Diameter (DIA) (MIN)	0.940 in (23.8 mm)

GRAPHS & CHARTS**Spectral Power Distribution**

D-8

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MTG-054-405-297	2. Page 1 of 1	3. Emergency Response Phone 1-816-608-9721	4. Manifest Tracking Number 002410418 FLE	
5. Generator's Name and Mailing Address Rough Inc. 11003 12068 McCallist Lewiston, ME 04240 Generator's Phone: 207-779-7028						
6. Transporter 1 Company Name CRYSTAL FLASH LTD PARTNERSHIP OF ME				U.S. EPA ID Number 610 345 810 146		
7. Transporter 2 Company Name				U.S. EPA ID Number		
8. Designated Facility Name and Site Address CRYSTAL FLASH LTD PARTNERSHIP OF ME 6011 WOODING AVE LEWISTON, ME 04240 Facility's Phone: 207-779-7028				U.S. EPA ID Number 610 345 810 146		
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. AUTOMOTIVE OILS	001 55		275	g	0010
	2.					
	3.					
	4.					
14. Special Handling Instructions and Additional Information DO NOT RECYCLE (CRANKCASE OIL) IN CASE OF EMERGENCY CONTACT CRYSTAL FLASH AT 1-816-608-9721 IN CASE OF SPILL CONTAIN WITH ABSORBENT MATERIAL AND VACUUM UP						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Offor's Printed/Typed Name Robert A. Hutzman		Signature [Signature]		Month Day Year 8 15 9		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:						
17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name: Signature: Month Day Year Transporter 2 Printed/Typed Name: Signature: Month Day Year						
18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: U.S. EPA ID Number 18b. Alternate Facility (or Generator) Facility's Phone: 18c. Signature of Alternate Facility (or Generator) Month Day Year						
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a. Printed/Typed Name: Signature: Month Day Year						

SRB received 8/29/12



Form Approved, OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number				
		MID982062317	1	800-424-9300, "1"	001815294 GBF				
5. Generator's Name and Mailing Address		Roush Industries B81 1750 Brown Rd Auburn Hills, MI 48326							
Generator's Phone:		(248) 393-5663							
6. Transporter 1 Company Name		HERITAGE-CRYSTAL CLEAN, LLC		U.S. EPA ID Number ILR000130062					
7. Transporter 2 Company Name				U.S. EPA ID Number					
8. Designated Facility Name and Site Address		HLC INKSTER OFFLOAD SITE 27140 PRINCETON AVE INKSTER, MI 48141		U.S. EPA ID Number ILR000130062					
Facility's Phone:		(847) 836-5670							
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))		10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
			No.	Type					
	1. DOT/RCRA REGULATED (USED OIL)		001	TT	225	6	221L		
	2. DOT/RCRA REGULATED (USED OIL, WATER)								
	3.								
4.									
14. Special Handling Instructions and Additional Information									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Offeror's Printed/Typed Name		Signature		Month		Day		Year	
Steve Tironi		[Signature]		07		24		12	
16. International Shipments									
<input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Part of entry/exit: _____ Date leaving U.S.: _____									
17. Transporter Acknowledgment of Receipt of Materials									
Transporter 1 Printed/Typed Name		Signature		Month		Day		Year	
Greg Labadas		[Signature]		07		24		12	
Transporter 2 Printed/Typed Name		Signature		Month		Day		Year	
18. Discrepancy									
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection									
Manifest Reference Number:									
18b. Alternate Facility (or Generator)		U.S. EPA ID Number							
Facility's Phone:									
18c. Signature of Alternate Facility (or Generator)		Month Day Year							
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. H141		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a									
Printed/Typed Name		Signature		Month		Day		Year	

SRB received 8/29/12

D-12

CRYSTAL FLASH ENERGY
1754 ALPINE AVE. N.W.
GRAND RAPIDS, MICHIGAN 49504
1-800-280-6227 * 616-365-0012
FAX 616-365-8347

WEEK	BILL OF LADING	ROUTE	TERMS
8-19-9	B-12114		
ACCOUNT NUMBER	PURCHASE ORDER #	EPA ID#	
801257009		MI6094555295	
PC108		COMMENTS	
REQUESTED BY			

SERVICE LOCATION

ROUSH Industries #28
12068 Market St
734 7791028 LIVONIA 48150 MI

CARRIER
Crystal Flash Energy
1754 Alpine Ave. NW
Grand Rapids, MI 49504

BILL OF LADING

T.T.	PROPER SHIPPING NAME	TOTAL	UNITS
✓	Used Oil	275	gal

MANF # 002410418-171e

SHIPPER: Roush Ind. #28

CARRIER: Crystal Flash Energy

PER: [Signature]

PER: [Signature]

DATE: 8-19-9

DATE: 8-19-9

EMERGENCY RESPONSE TELEPHONE NUMBER: (616) 608-9721

This telephone number is monitored at all times the Hazardous Materials is in transportation including storage incidental to transportation (172.604)

SUMMARY OF PRIOR AND CURRENT CHARGES

Prod	Description	SI	Comments	TODAY'S SERVICE	Unit Price	Qty	Total Charge
	8080 - used oil				275 gal		27.50
	8088 - Fuel Recovery						- 9.27
							<u>\$18.23</u>

(K#)
2794

CESQG Certification

I certify that my hazardous waste streams total less than 220 lbs (100kg) for this calendar month and that I am not required to obtain an EPA identification number.
Generator Initials

Chlor-D-Test
Under 1000 PPM ✓
Over 1000 PPM

Generator Knowledge
Rebutable

Due at next stop

Certificate of Generator - I swear and certify that except otherwise disclosed to Crystal Flash, the wastes described above are not hazardous wastes. Any hazardous substance that are contained in those wastes are resulted from normal use of the oil or lubricant that is being disposed. I have reviewed our physical facilities, administrative practices and operational procedures (or have supervised that review) and this certification is true, accurate and complete.

X [Signature]



Crystal Flash Energy
P.O. Box 1804
Grand Rapids, Michigan 49501
616-365-0012 or 800-280-6227

Today's Charges
Today's Credits
Sales Tax
Total Amount Due
Total Remittance (Check #)

D-13

SRB received 8/29/12

D-14

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

553840942

SC PPW 3/3/2011

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number MID094555299	2. Page 1 of 2	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 003909831 FLE		
5. Generator's Name and Mailing Address Roush Manufacturing 11916 Market Street Livonia, MI 48150 Generator's Phone: (734) 779-7266 ATTN: Mark Gomez							
Generator's Site Address (if different than mailing address) 12068 Market Street Livonia, MI 48150							
6. Transporter 1 Company Name Clean Harbors Environmental Services Inc U.S. EPA ID Number MAD039322250							
7. Transporter 2 Company Name Clean Harbors Environmental Services Inc U.S. EPA ID Number MAD039322250							
8. Designated Facility Name and Site Address Spring Grove Resource Recovery Inc 4879 Spring Grove Avenue Cincinnati, OH 45232 Facility's Phone: (513) 681-5738 U.S. EPA ID Number OHD000816629							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	x	UN1263. WASTE PAINT RELATED MATERIAL. 3. PG II	12 Dm		4800	P	D001 D035 F003 F005
	2.						
	3.						
	4.						
14. Special Handling Instructions and Additional Information 1. CH235257 ERG#128 1285							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.							
Generator's/Officer's Printed/Typed Name MATT SCOTT Signature <i>[Signature]</i> Month Day Year 10 13 11							
INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____						
	17. Transporter Acknowledgment of Receipt of Materials Transporter signature (for exports only): _____ Transporter 1 Printed/Typed Name Stephen Garlick Signature <i>[Signature]</i> Month Day Year 10 13 11 Transporter 2 Printed/Typed Name Chris Hargrove Signature <i>[Signature]</i> Month Day Year 10 13 11						
TRANSPORTER	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection Manifest Reference Number: _____ U.S. EPA ID Number						
	18b. Alternate Facility (or Generator) MATE Facility's Phone: _____ Month Day Year 10 13 11						
DESIGNATED FACILITY	18c. Signature of Alternate Facility (or Generator) _____ Month Day Year 10 13 11						
	19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. H141 2. 3. 4.						
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a Printed/Typed Name Steph Decker Signature <i>[Signature]</i> Month Day Year 10 13 11							

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number 110094556240		2. Page 1 of 1	3. Emergency Response Phone (800) 424-3742		4. Manifest Tracking Number 003909831 FLE		
5. Generator's Name and Mailing Address Rough Manufacturing 11010 Market Street Livonia, MI 48150 Generator's Phone: (734) 774-7700					Generator's Site Address (if different than mailing address) 11010 Market Street Livonia, MI 48150				
6. Transporter 1 Company Name Clean Harbors Environmental Services Inc.					U.S. EPA ID Number MA0039172250				
7. Transporter 2 Company Name Clean Harbors Environmental Services Inc.					U.S. EPA ID Number MA0039172250				
8. Designated Facility Name and Site Address Spring Grove Resource Recovery Inc. 4374 Spring Grove Avenue Cuyahoga, OH 44232 Facility's Phone: (440) 441-4710					U.S. EPA ID Number OH0000818529				
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
					No.	Type			
	1.	UNL203 WASTE PAINT RELATED MATERIAL 3 PG II			12	Drum	4200	P	0001 0039 0003
	2.								
	3.								
14. Special Handling Instructions and Additional Information L 01230457 1000123 4200									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.									
Generator's/Officer's Printed/Typed Name MATT SCOTT					Signature		Month Day Year 11 11 11		
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Transporter signature (for exports only): _____ Date leaving U.S.: _____								
	17. Transporter Acknowledgment of Receipt of Materials Transporter 1 Printed/Typed Name Signature Month Day Year 11 11 11								
SIGNATURE FACILITY	Transporter 2 Printed/Typed Name Signature Month Day Year 11 11 11								
	18. Discrepancy								
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
	Manifest Reference Number: _____								
	18b. Alternate Facility (or Generator) Facility's Phone: _____					U.S. EPA ID Number			
18c. Signature of Alternate Facility (or Generator)					Month Day Year 11 11 11				
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)									
1. 11111		2.		3.		4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a									
Printed/Typed Name					Signature		Month Day Year 11 11 11		



Land Disposal Restriction
Notification Form

Page : 1 of 1

Printed Date : Oct 12, 2011

MANIFEST INFORMATION

Generator : Roush Manufacturing

Address: 12068 Market Street
Livonia, MI 48150

Manifest Tracking Info.

003909831FLE

EPA ID #: MID094555299

Sales Order No: D53840942

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	CH235257	NON-WASTEWATER	2 (This is subject to LDR.)

EPA Waste Code

D001

D035F003F005

EPA Waste SubCategory

High TOC Ignitable Liquids

NONE

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ETHYL BENZENE	N	Y	N
METHANOL	N	Y	N
METHYL ETHYL KETONE	N	Y	N
TOLUENE	N	Y	N
XYLENES (MIXED ISOMERS)	N	Y	N

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1.

Waste analysis data, where available, is attached.

Signature :

Print Name

Title :

Date :

MATT SCOTT

10/13/11

D-17

SRB rec'd 8/29/12

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number M10094555299	2. Page 1 of 1	3. Emergency Response Phone (800) 483-3718	4. Manifest Tracking Number 004826869 FLE	
5. Generator's Name and Mailing Address Housh Manufacturing 11916 Market Street Livonia, MI 48150 (734) 779-7266 ATTN: Mark Gomez			Generator's Site Address (if different than mailing address) 12068 Market Street Livonia, MI 48150			
6. Transporter 1 Company Name Clean Harbors Environmental Services Inc			U.S. EPA ID Number MAD039322250			
7. Transporter 2 Company Name Clean Harbors Environmental Services Inc			U.S. EPA ID Number MAD039322250			
8. Designated Facility Name and Site Address Spring Grove Resource Recovery Inc 4879 Spring Grove Avenue Cincinnati, OH 45232 (513) 861-5733			U.S. EPA ID Number OHD000816629			
Facility's Phone:						
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.
			No.	Type		
	X	UN1263, WASTE PAINT RELATED MATERIAL, 3. PG II	14	DM	4000	P
	X	UN1263, WASTE PAINT RELATED MATERIAL, 3. PG II	1	DM	300	P
13. Waste Codes						
						0001 1035 F003
						0005
						0035 F003 F003
14. Special Handling Instructions and Additional Information 1. CHE38257 ERO#128 14 X55 2. CHE38256 ERO#128 1 X55						
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.						
Generator's/Officer's Printed/Typed Name Nick Meser			Signature Nick Meser		Month Day Year 03 20 12	
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:					
	17. Transporter Acknowledgment of Receipt of Materials					
	Transporter 1 Printed/Typed Name Stephen Garbik			Signature Stephen Garbik		Month Day Year 03 20 12
	Transporter 2 Printed/Typed Name GERARD T. PETERS			Signature Gerard T. Peters		Month Day Year 03 23 12
SIGNATED FACILITY	18. Discrepancy					
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection					
	Manifest Reference Number:					
	18b. Alternate Facility (or Generator)			U.S. EPA ID Number		
	Facility's Phone:					
	18c. Signature of Alternate Facility (or Generator)			Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)						
	1. H061	2. H061	3.	4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a						
Printed/Typed Name John Becker			Signature John Becker		Month Day Year 12 12 12	

EPA Form 8700-22A (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO GENERATOR

Claimant hereby has the appropriate permits for and will accept the state of the environment as shown on the attached map.

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Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST		1. Generator ID Number M10094935299		2. Page 1 of 1	3. Emergency Response Phone (800) 494-3718		4. Manifest Tracking Number 004826869		FLE			
5. Generator's Name and Mailing Address 11916 Market Street Lewiston, ME 04186 Generator's Phone: (206) 779-7265 ATTN: Bob Gandy					Generator's Site Address (if different than mailing address) 12048 Market Street Lewiston, ME 04186							
6. Transporter 1 Company Name Clean Harbors Environmental Services Inc.					U.S. EPA ID Number MA0039322250							
7. Transporter 2 Company Name Clean Harbors Environmental Services Inc.					U.S. EPA ID Number MA0039322250							
8. Designated Facility Name and Site Address Spring Grove Resource Recovery Inc. 4919 Spring Grove Avenue Lewiston, ME 04203 Facility's Phone: (206) 779-4778					U.S. EPA ID Number 08D000815928							
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))			10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes			
					No.	Type						
	1.	1. 012200 WASTE PAINT RELATED MATERIAL, 3, PG II			14	DM 4000	P			0001	0010	0002
	2.	2. 012200 WASTE PAINT RELATED MATERIAL, 3, PG II			1	DM 300	P			0001	0010	0002
	3.											
4.												
14. Special Handling Instructions and Additional Information 1. CH200057 EPC#125 17 X55 2. CH200058 EPC#125 17 X55												
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.												
Generator's/Offor's Printed/Typed Name					Signature			Month	Day	Year		
								03	20	12		
TRANSPORTER INTL	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: Date leaving U.S.:											
	Transporter signature (for exports only):											
	17. Transporter Acknowledgment of Receipt of Materials											
Transporter 1 Printed/Typed Name					Signature			Month	Day	Year		
Stephen G. Gandy								03	20	12		
Transporter 2 Printed/Typed Name					Signature			Month	Day	Year		
SIGNATED FACILITY	18. Discrepancy											
	18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection											
	Manifest Reference Number:											
	18b. Alternate Facility (or Generator)					U.S. EPA ID Number						
	Facility's Phone:											
18c. Signature of Alternate Facility (or Generator)								Month	Day	Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)												
1. 1001			2. 1001			3.			4.			
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a												
Printed/Typed Name					Signature			Month	Day	Year		



Land Disposal Restriction
Notification Form

Page : 1 of 2

Printed Date : Mar 20, 2012

MANIFEST INFORMATION

Generator : Roush Manufacturing

Address: 12068 Market Street
Livonia, MI 48150

EPA ID #: MID09455299

Manifest Tracking Info.

004826869FLE

Sales Order No: D54201762

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
1.	1	CH235257	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D001			High TOC Ignitable Liquids	
D035F003F005			NONE	

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ETHYL BENZENE	N	Y	N
METHANOL	N	Y	N
METHYL ETHYL KETONE	N	Y	N
TOLUENE	N	Y	N
XYLENES (MIXED ISOMERS)	N	Y	N

LINE ITEM INFORMATION

Line Item:	Page No:	Profile No:	Treatability Group:	LDR Disposal Category
2.	1	CH235256	NON-WASTEWATER	2 (This is subject to LDR.)
EPA Waste Code			EPA Waste SubCategory	
D035F003F005			NONE	

LDR Chemical Data

Chemical	Underlying Hazardous Constituents	Constituents of Concern	Contaminants Subject to Treatment
ETHYL BENZENE	Y	Y	N
METHANOL	Y	N	N
TOLUENE	N	Y	N
XYLENES (MIXED ISOMERS)	N	Y	N



Land Disposal Restriction
Notification Form

Page : 2 of 2

Printed Date : Mar 20, 2012

Certification

Applies to
Manifest Line
Items

Pursuant to 40 CFR 268.7(a), I hereby notify that this shipment contains waste restricted under 40 CFR Part 268.

1. 2.

Waste analysis data, where available, is attached.

Signature :

Nick Mes

Print Name

Nick Mes

Title :

Shipping hi-lo

Date :

3-20-12

D-22

SRB received 8/29/12

17-24

Key:	X = REQUIRED N = NEEDS IMPROVEMENT NT = NOT YET TRAINED C = COMPETENT
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[illegible]

JOB DESCRIPTION**Job Title:**

Environmental, Health and Safety Coordinator

Job Summary:

Responsible for implementing and maintaining a safety and health program for the Company. The Environmental, Health & Safety Coordinator will also ensure and maintain compliance with Environmental, MIOSHA, DEQ and OSHA Standards and Regulations.

Reporting Responsibilities:

Reports to the Special Projects Manager.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Knowledge, Skills, and Abilities:

- ☐ Bachelor's degree (B.A.) from four-year college or university; in a job-related field or equivalent.
- ☐ Five years experience related to defined job responsibilities or equivalent training.
- ☐ While performing the duties of this job, the employee is regularly required to sit, walk; and talk or hear. The employee must occasionally lift and/or move up to 10 pounds and may be subjected to loud noise levels created by power tools, production machinery and heavy traffic. The employee may also be required to work near moving mechanical equipment.
- ☐ Competence in use of Microsoft Office applications for Excel, Word, Projects.
- ☐ Strong organizational skills.
- ☐ Self Starter
- ☐ Availability to work overtime frequently, including weekends and travel is possible.
- ☐ High communication, interpersonal and organizational skills
- ☐ Ability to work on a flexible schedule when follow-up or training is require on off shifts.
- ☐ Ability to handle or work near industrial chemicals or vapors such as solvents, cleaning agents and flammable liquids.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- ❑ Manage reports, etc. with government regarding paint usage and disposal of hazardous materials
- ❑ Assess and investigate environmental working conditions in relation to safety and health compliance.
- ❑ Create, write, and develop necessary safety training materials, documents and procedures for an effective safety program.
- ❑ Coordination of EPA/DEQ and ISO 14001 compliance, response, training, reporting, record keeping and auditing *slg*
- ❑ Conduct quarterly safety and health inspection surveys and take appropriate corrective action in compliance with MIOSHA/OSHA regulations.
- ❑ Enforce MIOSHA/OSHA standards and regulations for the safety of the employees and customers while on company property.
- ❑ Training of Corporate Environmental, Safety and Evacuation. *slg*

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

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JOB DESCRIPTION

CORM (Jim Wenzel)

Job Title:

Material Control Supervisor - RMT

Job Summary:

Responsible for coordinating the orderly and timely flow of all materials to support production.

Reporting Responsibilities:

Position reports to the Director of Operations.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and /or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Knowledge, Skills, and Abilities:

- ☐ Associate's degree or equivalent from a two-year college or technical school; or two to four years related experience and/or training or equivalent combination of education and experience.
- ☐ Familiarity with products and services, along with methods and procedures used to produce these products provided by Roush, preferred.
- ☐ Ability to read, analyze and interpret general business periodicals, professional journals, technical procedures or governmental regulations, when applicable. slb
- ☐ Ability to write reports, business correspondence and procedure manuals.
- ☐ Ability to effectively present information and respond to questions from groups of managers, clients and employees.
- ☐ Ability to calculate figures and amounts such as discounts, interest, commissions, proportions, percentages, area, circumference, and volume. Ability to apply concepts of basic algebra and geometry.
- ☐ Ability to define problems, collect data, establish facts and draw valid conclusions. Ability to interpret an extensive variety of technical instructions in mathematical or diagram form and deal with several abstract and concrete variables.
- ☐ Competence in the use of Microsoft Office applications for word processing and spreadsheets.

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- ☐ Coordinate the delivery of all materials and equipment of purchased and consigned materials within the assigned area of the company.

- ☐ Responsible for notifying purchasing/suppliers of non-conforming material and assists in requesting return shipments and RTVs.
- ☐ Provide management reports, as requested.
- ☐ Maintain accurate inventory levels of computerized and non-computerized inventory.
- ☐ Maintain and administer all Physical and Cycle counting aspects.
- ☐ Recommends measures to improve material control procedures.
- ☐ Responds to needs of customers, both internal and external.
- ☐ Suggest changes in working conditions and use of equipment to increase efficiency of the department.
- ☐ Analyzes and resolves work problems, or assists employees in solving work problems.
- ☐ Performs activities of material control personnel, when required. SRB
- ☐ Interprets company policies to employees and enforces safety rules. SRB
- ☐ Monitors work in progress and finished products.
- ☐ Ensure compliance to Quality System procedures and work instructions.
- ☐ Responsible for personnel reporting to him/her including Performance Reviews.
- ☐ Maintains time and attendance records.
- ☐ Performs other related duties as assigned by management.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

JOB DESCRIPTION

~~PRIC~~ PNTC

Job Title:

Robotic Technician

Job Summary:

The Robotic Technician is responsible for maintaining all robotic equipment within the plant to ensure uninterrupted service in those areas where they are used.

Reporting Responsibilities:

Position reports to, or is assigned by, the Paint Department Supervisor

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Knowledge, Skills, and Abilities:

- ☐ High School diploma or general education degree (GED); or one to three years related experience and/or training; or equivalent combination of education and experience.
- ☐ Must be knowledgeable of painting or sanding operations of automotive body components

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- ☐ Develops and maintains set-ups for all parts that will be robotically sanded or painted
- ☐ Confers with engineering when developing fixtures for new programs
- ☐ Maintains all robotic equipment and end-of-arm tooling, performs required preventive maintenance, and updates records when necessary
- ☐ Maintains acceptable inventory level of spare parts to support repairs or replacement – supports the maintenance personnel when necessary
- ☐ Troubleshoots robotic failures or inconsistencies by evaluating programming, schematic diagrams or blueprints
- ☐ Assists in the changing of any filters, nozzles and tips, or other duties as assigned by the supervisor
- ☐ Coordinates efforts with others to ensure optimum efficiencies of robots
- ☐ Maintains housekeeping within the robotic area – cleans parts, tools, and fixtures with rags or solvents
- ☐ Utilizes proper methods for disposal of scrap and cleaning materials
- ☐ Assists in the training of other employees to develop them as a back-up in this position

Work Environment

- ☐ Predominately in a factory setting
- ☐ Involves operating or working near moving mechanical equipment
- ☐ May work in environments that are hazardous and require personal protection equipment
- ☐ May be exposed to extreme temperatures
- ☐ Must be able to lift and move containers of up to 50 lbs.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

JOB DESCRIPTION

Job Title:

Production Paint Booth Supervisor

Job Summary:

Supervise employees and maintain workflow within the paint booth area. Inspect parts to ensure the parts conform to standards. Inspect and maintain the paint booth area. Order paint and booth materials as needed.

Reporting Responsibilities:

Position reports to the Quality Manager.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill and/or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Knowledge, Skills, and Abilities:

- Professional knowledge of paint and paint applications.
- Professional knowledge of plastics.
- Professional knowledge of paint booth operations.
- Ability to communicate effectively verbally and in written form.
- Ability to lift 50+ lbs. frequently.
- Knowledge of basic mathematics, measurements and volumes.
- Ability to stand for long lengths of time.

Essential Duties and Responsibilities included: (Others may be assigned)

1. Start up paint booth.
2. Start up Ad-Pro system.
3. Start up Base system.
4. Start up Clear system.

5. Start up Clear system 2.
6. Turn on paint ovens.
7. Mix paint.
8. Prep paint guns.
9. Advise paint team of current daily quota.
10. Paint parts. (See Production Paint Painter description.)
11. Check inventory and order materials if necessary.

The specific statements shown in each section of this description are general in nature are not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties. On the job training will be made available as needed to qualified persons.

JOB DESCRIPTION

Job Title:

Paint Room Technician

Job Summary:

The Paint Room Technician is responsible for coordinating all activities within the paint room to ensure an uninterrupted flow of materials to support the paint booth operation.

Reporting Responsibilities:

Position reports to, or is assigned by, the Paint Department Supervisor

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and /or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Knowledge, Skills, and Abilities:

- ☐ High School diploma or general education degree (GED); or one to three years related experience and/or training; or equivalent combination of education and experience.
- ☐ Must be knowledgeable of Paint and paint applications
- ☐ Must have experience working in paint mix rooms and with automated paint spraying systems
- ☐ Knowledge of painting automotive exterior plastic body components

Essential Duties and Responsibilities include the following. Other duties may be assigned.

- ☐ Maintains proper inventory levels of all paints, solvents, and supplies necessary to support daily painting operations
- ☐ Completes all daily paint mixing, color matching, testing, and inspections as required by plant SOP's
- ☐ Conducts periodic mix / spray room audits
- ☐ Maintains test equipment and arranges for calibrations when they are due
- ☐ Participates in paint defect identification and problem solving sessions
- ☐ Coordinates efforts with paint robotic technicians to ensure optimum efficiencies
- ☐ Arranges for the transfer of inventory from the outside storage facility to the day room
- ☐ Maintains all painting equipment, performs required preventive maintenance, and updates records when necessary
- ☐ Maintains housekeeping within the day room and spraying compartments
- ☐ Utilizes proper methods for disposal of scrap and paint materials

- ☐ Assists others within the paint booth in changing filters, nozzles and tips, kettle repair, and other duties as assigned by the supervisor
- ☐ Assist in the training of other employees in proper day room operations

Work Environment

- ☐ Predominately in a factory setting
- ☐ Involves operating or working near moving mechanical equipment
- ☐ May work in environments that are hazardous and require personal protection equipment
- ☐ May be exposed to extreme temperatures
- ☐ Must be able to lift and move containers of up to 50 lbs.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

8/31/2012 SRB

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MCRM

ROUSH

JOB DESCRIPTION

Job Title:

Material Control Personnel

Job Summary:

Comment [LS1]:

Responsible for movement of purchased and consignment materials or equipment and general maintenance of the building assigned.

Reporting Responsibilities:

Position reports to the Material Control Leader, Material Control Supervisor or Purchasing/Material Control Supervisor.

To perform this job successfully, an individual must be able to perform each essential duty satisfactorily. The requirements listed below are representative of the knowledge, skill, and /or ability required. Reasonable accommodations may be made to enable individuals with disabilities to perform the essential functions.

Knowledge, Skills, and Abilities:

- ☐ High school diploma or general education degree (GED); or one to three months related experience and/or training; or equivalent combination of education and experience.
- ☐ Experience operating a Hi-Lo, preferred
- ☐ Ability to read and comprehend simple instructions, short correspondence, and memos. Ability to write simple correspondence. Ability to effectively present information in one-on-one and small group situations to customers, clients, and other employees of the organization.
- ☐ Ability to add and subtract two digit numbers and to multiply and divide with 10's and 100's. Ability to perform these operations using units of American money and weight measurement, volume, and distance.
- ☐ Ability to apply common sense understanding to carry out instructions furnished in written, oral, or diagram form. Ability to deal with problems involving several concrete variables in standardized situations.
- ☐ While performing the duties of this job, the employee is regularly required to lift and/or move up to 100 pounds.

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Essential Duties and Responsibilities include the following. Other duties may be assigned.

- ☐ Maintain material or equipment flow to and from shop floor or other location as required.
- ☐ Receive, check and stock all incoming materials and equipment.
- ☐ Inventory materials and equipment as requested.
- ☐ Ship materials and equipment as requested.
- ☐ Responsible to support department Quality System and follow any procedures or work instructions provided for assigned projects.

The specific statements shown in each section of this description are general in nature and not intended to be all-inclusive. They represent typical elements and criteria necessary to successfully perform the job. Expectations are that the employee will obtain additional skills, knowledge and education in order to perform their duties.

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